



CNR International



MURCHISON FIELD DECOMMISSIONING STAKEHOLDER ENGAGEMENT REPORT

**Issued October 2013, updating the May 2013 report
to incorporate responses to the statutory and public consultation**

MURDECOM-CNR-PM-REP-00233

PREFACE

This Stakeholder Engagement Report is part of a suite of documents that support the Murchison Field Decommissioning Programme.¹

The first version was originally submitted to the Department of Energy and Climate Change (DECC) in May 2013 as part of the statutory and public consultation alongside the Comparative Assessment Report,² Environmental Statement,³ and Independent Review Consultants' Final Report.⁴

These documents are all available online at www.cnri-northsea-decom.com on the Decommissioning Programme page in both their pre- and post-consultation versions.

This current edition of the Stakeholder Engagement Report was updated with the inclusion of a revised Chapter 4 (previously 'Next Steps', now renamed 'Formal Consultation') and supporting material in Appendices 5, 6 and 7 to complete the record of activity during the statutory and public consultation period (31 May to 12 July 2013) and beyond. The main body of the report remains unchanged apart from very minor amendments to phrasing to reflect the issue of this document post-consultation.

¹ Murchison Field Decommissioning Programmes – MURDECOM-CNR-PM-REP-00232

² Murchison Decommissioning Comparative Assessment Report – MURDECOM-CNR-PM-REP-00225

³ Environmental Statement for the Decommissioning of the Murchison Facilities – MURDECOM-BMT-EN-REP-00198

⁴ Murchison Decommissioning Comparative Assessment – Final IRC Report – MURDECOM-XDS-PM-REP-00062

CONTENTS

PREFACE	2
CONTENTS	3
1 INTRODUCTION	5
2 COMMITMENT TO STAKEHOLDER ENGAGEMENT	7
2.1 Identification of Stakeholders	7
2.2 Independent Review Consultants	8
2.3 Summary of Main Stakeholder Groups	8
2.4 Engagement Strategy	8
2.4.1 Best Practice	8
2.4.2 A Tailored Approach	9
2.4.3 A Dedicated Website	9
2.4.4 A Stakeholder Focal Point	10
3 KEY ELEMENTS OF THE ENGAGEMENT PROGRAMME	11
3.1 Baseline Environmental Survey Scoping	11
3.1.1 Environmental Impact Assessment Scoping Report	11
3.2 Stakeholder Workshop (1) – March 2012	13
3.3 Stakeholder Workshop – Follow Up Meetings	15
3.3.1 Scottish Oceans Institute/NERC Sea Mammal Research Unit (March 2012)	15
3.3.2 Decom North Sea (March 2012)	15
3.3.3 Aberdeen Grampian Chamber of Commerce (April 2012, February 2013)	16
3.3.4 FLTC (April 2012)	16
3.3.5 Greenpeace Research Laboratories (April 2012, January, April, May 2013)	16
3.3.6 RSPB (April 2012)	18
3.3.7 JNCC with Marine Scotland (April 2012)	19
3.4 Comparative Assessment – Incorporation of Stakeholder Views	19
3.5 Comparative Assessment – Follow Up on Stakeholder Concerns	21
3.6 Stakeholder Workshop (2) – Report Back to Stakeholders	22
3.7 Additional Actions Arising	23
3.8 Other Stakeholder Engagement	24
3.8.1 CNRI Employees and Contractor Crew (Offshore and Onshore)	25
3.8.2 Murchison Partners	25
3.8.3 Government Departments (DECC)	25
3.8.4 Other Government and Regulatory Agencies	26
3.8.5 Statutory Consultees	27
3.8.6 Industry and Environmental Umbrella Organisations	27
3.8.7 Supply Chain and Representative Organisations	28
3.8.8 Commercial Partners with Infrastructure Links to Murchison	28
3.8.9 Section 29 Non-Equity Companies	29
4 FORMAL CONSULTATION	30
4.1 Statutory Consultation	30
4.2 Broader Stakeholder Consultation and Notification	30
4.3 Provision of Documentation	31
4.4 The OSPAR Commission	31
4.5 Consultation Results	31

5 APPENDICES

- APPENDIX 1 External Stakeholder Organisations
- APPENDIX 2 List of External Participants in the Stakeholder Workshop
Held 14 March 2012
- APPENDIX 3 List of External Participants in the Stakeholder Workshop
Held 8 November 2012
- APPENDIX 4 Comparative Assessment Workshop:
Stakeholder Concerns and Expectations Pre-Read
- APPENDIX 5 Example of Public Notice
- APPENDIX 6 Consultation Responses from Statutory Consultees / CNRI Replies
- APPENDIX 7 Consultation Responses from Other Stakeholders / CNRI Replies

1. INTRODUCTION

This report sets out the measures which CNR International (UK) Limited (CNRI) has taken to engage with stakeholders during the development of the decommissioning programme for the Murchison platform and its related subsea infrastructure. It summarises the company's approach to engagement and the programme to support this, highlighting issues, concerns and expectations which have been raised during the dialogue and the way in which these have been addressed.

For those who have not yet read the related documents (described in the Preface) which underpin the Draft Decommissioning Programme, it is worth noting that the development of decommissioning options for Murchison has followed investigation of all potential alternative uses for the platform (including reuse and recycling), a raft of studies and a full comparative assessment for the key removal and disposal options for the platform jacket, drill cuttings and pipelines.

The comparative assessment weighed the options against five key criteria as required by the Department of Energy and Climate Change (DECC):⁵ safety risk to personnel (offshore, onshore and to the fishing community), environmental impacts, societal impacts, technical and economic aspects. The starting point for assessment of the decommissioning options was complete removal in order to leave a clean seabed, within which the possibility of partial removal was also considered.

The comparative assessment process and outcomes are described in full in the Draft Decommissioning Programme and its supporting documents, notably the Comparative Assessment Report and Environmental Statement, underpinned by the supporting studies used as the basis for the programme's development and submission to the UK Government.

Following the statutory consultation on the Draft Decommissioning Programme, the Stage 2 Decommissioning Programme was formally submitted to DECC. This incorporated responses to the statutory consultation received by CNRI by the consultation closing date (12 July 2013) and the company's replies to these.

To summarise, the Draft Decommissioning Programme describes the proposed activities for the Murchison Field, namely that:

1. All platform and subsea wells will be plugged and abandoned in accordance with Oil & Gas UK Guidelines.
2. The platform topside modules will be removed and returned to shore for reuse, recycling or disposal.
3. It is recommended that the jacket be removed down to the top of footings at 44m above the seabed and returned to shore for reuse, recycling or disposal. The jacket footings would then be left in place.
4. The drill cuttings pile located within the jacket footings will be left *in situ* to degrade naturally with time.

⁵ www.gov.uk/government/uploads/system/uploads/attachment_data/file/69754/Guidance_Notes_v6_07.01.2013.pdf

5. On completion of the decommissioning programmes a seabed survey will be undertaken to identify oilfield related debris within the platform 500m zone and a 200m wide corridor along each pipeline. All items of oilfield debris will be categorised and in consultation with DECC a management and recovery plan will be agreed. Following completion of the recovery plan, verification of seabed clearance by an independent organisation will be carried out.
6. The short early production pipeline bundles and associated subsea equipment will be removed and returned to shore for recycling or disposal.
7. The main oil export line PL115 will be left *in situ* with remedial rock placement over exposed sections. The main pipeline tie in spools, at either end, will be removed and returned to shore for recycling or disposal.
8. The Murchison gas import riser PL165 will be decommissioned and isolated at the subsea riser tie-in spool as part of the Murchison Field decommissioning programme. This will be in preparation for the future decommissioning of PL165 by the NLGP System Owners.

2. COMMITMENT TO STAKEHOLDER ENGAGEMENT

CNRI recognises that constructive two-way dialogue with its stakeholders is essential for long-term, sustainable operations and is fundamental to developing the best decommissioning programme possible.

Stakeholders are defined as any individual or group with an interest in or some aspect of rights in ownership of a decommissioning project who can contribute in the form of knowledge or support, or who can impact or be impacted by the project, its work or outcome, or have views on these matters.

From the outset of planning for the decommissioning of the Murchison Field, the company has sought to develop relationships and dialogue to best meet stakeholders' needs and expectations and inform the development of the best possible set of proposals. The approach adopted by CNRI has focused on developing close working relationships with interested parties, establishing confidence and trust to share understanding and identify where additional opportunities and ideas can usefully be explored. The company is committed to transparency and to making available to stakeholders in a timely manner all information and data that can reasonably be provided, as well as to treating all stakeholders equally.

Communication of the various issues and concerns raised by the decommissioning studies along the way so that they are understood and can be properly considered by stakeholders has been a priority, as has gaining stakeholders' feedback and views on decommissioning scenarios to inform the development of the best possible plans.

The engagement programme has provided important input into the company's decision making process, complementing – although not replacing - the statutory approvals process or CNRI's own approvals process.

2.1 Identification of Stakeholders

There are many and varied stakeholders associated with the decommissioning of Murchison, each with their own spectrum of interests and remit. The first task for CNRI, having embarked on its pre-planning programme, was to develop a rounded communication programme which would meet stakeholder needs.

The programme started with an initial identification of potential stakeholders within the context of their respective interests. This was undertaken by ascertaining:

- Known interest in issues specific to the project or to decommissioning
- Other relevant decommissioning projects
- Stated interests and remit
- Area of operations, national and international
- Known involvement with or interest in stakeholder engagement in other decommissioning projects
- Working history with CNRI and ongoing relationships

Additional stakeholders were added during the planning 'journey' where gaps were identified or requested involvement. A full list of the current stakeholders for the purposes of engagement on the comparative assessment and preparation of the Decommissioning Programme appears at Appendix 1.

2.2 Independent Review Consultants

As a further check to provide reassurance to stakeholders, CNRI appointed independent review consultants⁶ (IRC) to verify the completeness of the pre-planning studies and to confirm the methodology for and adherence to the comparative assessment process adopted by the company for determining the way forward. The IRC posed many challenging questions in its oversight of the project which acted as an initial proxy for broader stakeholder review, ensuring that the foundation on which the comparative assessment process was built was robust.

2.3 Summary of Main Stakeholder Groups

The main stakeholder groupings for the Murchison decommissioning pre-planning were identified as follows:

- CNRI employees and contractor crew (offshore and onshore)
- Murchison partners
- Government departments
- Government and regulatory agencies
- Industry and industry organisations
- Local authorities
- Environmental non-governmental organisations (NGOs)
- Commercial partners with infrastructure links to Murchison
- Supply chain and representative organisations
- Section 29 Non-Equity notice holder (companies with ongoing liabilities towards Murchison)
- Statutory consultees

2.4 Engagement Strategy

2.4.1 Best Practice

While members of the CNRI Decommissioning Team have extensive experience gained from other relevant projects over the last decade, the Murchison decommissioning is nevertheless a first for CNRI as a company. It was therefore considered important to understand and anticipate as fully as possible the potential issues which could arise during the development of the project.

With respect to stakeholder engagement, an early priority was to inform development of the communications programme incorporating best practice examples. Five operators assisted CNRI with this informal learning through a series of one-to-one meetings (BP, ConocoPhillips, Fairfield Energy,

⁶ The role of the Independent Review Consultants is described in their Final Report – MURDECOM-XDS-PM-REP-00062

Marathon and Shell) together with industry organisations Oil and Gas UK, Decom North Sea, OPITO (the oil and gas industry's focal point for skills learning and workforce development) and the Energy Industries Council.

2.4.2 A Tailored Approach

Throughout the pre-planning and as a result of the conversations with other operators CNRI has been conscious of the demands on stakeholders from a range of sources, reported by some as 'stakeholder fatigue', not least borne out of pressure on their resources (time and financial), particularly amongst environmental non-governmental organisations.

The strategy adopted for communication was therefore to develop a tailored approach to consultation wherever possible, adapted to the needs of stakeholders rather than a 'one size fits all approach,' with relationships, built on individual and tailored contact sensitive to the communications needs and preferences of each.

This approach informed the discussions throughout the pre-planning stages and will continue to underline the ongoing stakeholder engagement programme to ensure that views are captured and issues addressed in the most constructive way possible as the project moves forward into the execution phase.

Bilateral and, in some cases, multilateral update meetings with stakeholders according to their preferences have been held in order to share news on progress, stimulate discussion, understand expectations, address and resolve any potential issues and seek collaborative opportunities.

In recognition of the benefits of sharing views and priorities on the five key criteria which formed the basis of the comparative assessment, stakeholders were also invited to attend two workshops (described below), held in March and November 2012.

2.4.3 A Dedicated Website

To facilitate the sharing of information and to act as a portal for those seeking information on the decommissioning pre-planning process – including those not previously identified by CNRI as key stakeholders but who nevertheless have an interest – a dedicated website was established at an early stage at www.cnri-northsea-decom.com, including an enquiry and response interface.

The website also played a significant role in the statutory consultation which accompanied submission of the Draft Decommissioning Programme in May 2013. DECC Guidance Notes⁷ state that "*operators will need to develop and manage a wide-ranging public consultation process*" and Oil & Gas UK has also published guidelines⁸ on stakeholder engagement. Both clearly specify the use of the internet to

⁷ www.gov.uk/government/uploads/system/uploads/attachment_data/file/69754/Guidance_Notes_v6_07.01.2013.pdf

⁸ Initially these appeared as the UKOOA Guidelines on Stakeholder Engagement for Decommissioning Activities, (2006), see www.oilandgasuk.co.uk/publications/viewpub.cfm?frmPubID=219, since replaced (2013) by UK Oil & Gas Guidelines on Stakeholder Engagement during Decommissioning Activities, available online at www.oilandgasuk.co.uk/publications/index.cfm

inform stakeholders and to publish documents for formal consultation on decommissioning programmes.

2.4.4 A Stakeholder Focal Point

Engagement and communications activities have been managed throughout the pre-planning phase by the Stakeholder and Compliance Lead who acts as a single contact point to broker connections between CNRI and its audiences. The Stakeholder and Compliance Lead continued to facilitate engagement during the statutory consultation period of the draft decommissioning programme (see section 4.1), as well as for the derogation application and thereafter will do so for the final decommissioning application.

3. KEY ELEMENTS OF THE ENGAGEMENT PROGRAMME

3.1 Baseline Environmental Survey Scoping

As part of the pre-planning process, CNRI met with the DECC Environmental Management Team, the Joint Nature Conservation Committee (JNCC) and Marine Scotland in December 2010. The objective was to not only provide an overview of current decommissioning activities and intentions but to specifically discuss proposals for scope of the baseline environmental survey to establish the current state of the subsea environment on the basis of data from literature and field surveys, and to agree the way forward.

This resulted in agreement that the survey scope met the requirements of all parties, with JNCC confirming that it presented a good assessment of the options being considered. Marine Scotland subsequently provided the Oil and Gas UK Platform Specific Surveys Report 2005/6 which supplemented the background material for the survey scope.

The methods for the physical, chemical, and faunal analysis of survey samples, based on appropriate OSPAR,⁹ JAMP¹⁰ and OLF¹¹ guidelines, were defined by CNRI and shared with participants. Marine Scotland confirmed that they were based on recognised guidelines and, as such, met the regulatory requirements.

The presence of *Lophelia pertusa* on the Murchison jacket was also highlighted by CNRI who sought advice from JNCC on what would be considered a “significant” growth that would trigger the requirement for an Appropriate Assessment.¹² JNCC formally responded in writing, recommending an assessment of the extent and distribution of this cold water coral on the legs of the installation to be reported in the Environmental Statement. They further advised that as the coral would not have occurred without the presence of the platform, mortality as a result of decommissioning operations would not be considered as an issue of significant concern for the Environmental Impact Assessment. At JNCC’s request, CNRI agreed to provide samples of *Lophelia pertusa* from the marine growth survey conducted in 2011.

Copies of the baseline environmental survey¹³ were subsequently provided to all parties in February 2012 and discussed in outline at the meetings with the parties held in April 2012.

3.1.1 Environmental Impact Assessment Scoping Report

In June 2011, the draft Environmental Impact Assessment (EIA) Scoping Report for the project was published¹⁴ on the dedicated project website. Designed to establish the issues, data requirements, and

⁹ OSPAR 2004/11. Guidelines for Monitoring the Environmental Impact of Offshore Oil and Gas Activities

¹⁰ JAMP 2002/16. Guidelines on Quality Assurance for Biological Monitoring in the OSPAR area

¹¹ OLF 2003. Guidelines for Characterisation of Offshore Drill Cuttings Piles (www.olf.no)

¹² An appropriate assessment (AA) is required under the Habitats Directive (92/43/EEC) for any plan or project likely to have a significant effect on European sites designated for nature conservation, and is used as a decision making tool to determine whether the activities can go ahead

¹³ Pre-Decommissioning Environmental Survey Report for the Murchison Field MURDECOM-ERT-EN-REP-00056

¹⁴ www.cnri-northsea-decom.com/Documents/MURDECOM-BMT-EN-REP-00036%20REVC1.pdf

impacts to be addressed through specific investigation, CNRI was keen to encourage comment by interested parties so that views could be taken on board from an early stage in defining the scope of the environmental studies and confirming the brief to the contractors who would undertake them.

Statutory consultees were alerted to the availability of the Scoping Report by post that month with telephone and email follow up, while the broader stakeholder group was contacted in August and early September 2011 by telephone and email (with the report) to establish interest and offer the opportunity to comment. This also served as a useful means of introduction and relationship building. Where stakeholders were not available by telephone despite repeated attempts to speak, email contact (with copies of the report) was made. In mid-September, reminder emails were subsequently sent to those who had not already commented.

Substantive comments were received from two key stakeholders (the National Oceanography Centre and the International Research Institute of Stavanger – IRIS Biomiljo), while a third stakeholder, Georgia Baylis-Brown (an MSc student in Environmental Science at University of East Anglia) sought clarification on how CNRI would be approaching the environmental studies and conducted a detailed review of the Scoping report. The main substantive points raised by stakeholders are summarised as follows:

- Contamination of the marine environment is considered to be the most important issue, and modelling of the fate of the contaminants is encouraged.
- There may be significant fishing activity within the Murchison Field by vessels registered in countries outside UK.
- It very important to consider the "legacy" impacts of anything left behind, and compare these with the short-term impacts of the actual decommissioning work.
- Marine growth may fall off the structure during transit to or at the demolition yard, which has the potential to introduce marine invasive species.
- The Murchison jacket may be currently acting as an artificial reef providing shelter for fish; removal of the jacket will remove any positive impacts that may be associated with fish recruitment.
- Cumulative impacts of leaving pipelines in place should be considered.
- Impacts associated with resource usage and atmospheric emissions should be considered for all decommissioning options.

CNRI provided individual responses to stakeholder comments describing how any concerns would be addressed within the final Murchison Environmental Impact Assessment, and a revised version of the EIA Scoping Report incorporating the responses was published on the website in February 2012.¹⁵ All stakeholders were alerted to its availability by email in February 2012. Since then, Table 6.2 of the Environmental Statement identifies the influence on the Murchison EIA of these comments and specifies where details of outcomes can be found.

¹⁵ Murchison Decommissioning EIA Scoping Report – MURDECOM-BMT-EN-REP-00036 Rev C

In addition to those who responded with specific environmental points, several stakeholders used the contact as opportunity to draw attention to points which they considered needed to be incorporated into the planning for the broader Decommissioning Programme. These included comments from the International Marine Contractors Association (IMCA) who registered their views on contracting strategies and the need to anticipate the inherent risks and the nature of the decommissioning work and potential cost implications; and that safety issues should be no different for decommissioning than for construction.

Meanwhile, the International Marine Organisation (IMO) expressed a preference not to comment but drew attention to the London Protocol Guidance with particular reference to 1) the Specific Guidelines for Assessment of Platforms or other Man-Made Structures at Sea and 2) a similar document on the Disposal of Organic Matter (Fouling on Rigs in Off- or Near-shore areas). This information was shared with CNRI's environmental consultants.

The Royal Yachting Association also noted that they may be interested in commenting at a later date in respect of impacts on cruising routes which could be impacted by additional vessel movements during decommissioning and provided a copy of the RYA Cruising Atlas for reference purposes.

The Aberdeen Grampian Chamber of Commerce also put a link to the Scoping Report on its website in order that interested members had the opportunity to comment if they wished.

3.2 Stakeholder Workshop (1) – March 2012

Building on the contact established with stakeholders during informal consultations on the EIA Scoping Report, CNRI held its first stakeholder workshop. The overall aim of the workshop was to provide an opportunity for stakeholders to hear about and give feedback on the pre-planning for decommissioning the Murchison platform and the options to be taken forward into the comparative assessment process. A total of 37 external stakeholders¹⁶ participated.

The Environment Council, an organisation which specialises in stakeholder engagement, was commissioned to work with CNRI to design the workshop and to independently facilitate the discussions.

The specific objectives of the workshop were to:

- Brief participants on the Murchison platform context, decommissioning approach and plans.
- Brief participants on the progress of the decommissioning studies to date and indications of the decommissioning options and likely issues and challenges for the platform.
- Review the approach to decommissioning and engagement with stakeholders.
- Collectively discuss the issues and challenges faced by decommissioning the Murchison platform.
- Gain feedback from participants on the proposed decommissioning option(s) in particular any perceived gaps in technical studies to date and priority issues for further consideration.

¹⁶ See Appendix 2: List of External Participants in the Stakeholder Workshop Held 14 March 2012

Within this framework, a shared understanding of decommissioning options being taken forward into the comparative assessment was achieved with respect to (primarily) the platform jacket, drill cuttings and pipelines. Questions were answered as fully as possible, while additional general considerations and opportunities to be explored were also highlighted. This included a request that Subsea UK be included on future stakeholder engagement, followed up by CNRI after the workshop.

A full report of the meeting was published online¹⁷ shortly after the workshop, including agenda, project overview, transcript of proceedings, slides, attendance and invitation details, plus evaluation. Its availability was notified to stakeholders by email and further comment invited.

Stakeholder questions and remarks were subsequently collated by CNRI with other input received from other stakeholder contact described in this report as part of the pre-briefing for the Comparative Assessment Workshop held in May (see section 3.4 and Appendix 4)¹⁸ and to enable views and expectations to be taken into account in the development of the broader decommissioning programme.

No follow up comments were received from stakeholders who had been present at the workshop in response to the workshop report, other than from those resulting from separate meetings. Separately, IMCA asked to be kept advised about decommissioning progress and requested that direct liaison on contractual issues be undertaken without its facilitation. IMCA's Decommissioning Contracting Principles were once again cited as the benchmark for commercial discussions with the Association's members – an area considered by the organisation as being beyond the scope of stakeholder communications. These Contracting Principles were shared with other members of the decommissioning team, including those responsible for contract strategy development.

Seven further meetings were held post-workshop to discuss CNRI's approach to the Murchison decommissioning planning and emerging issues, both with those who had been present on 14 March and who wanted to follow up on particular issues as well as with those who were unable to attend. These meetings comprised:

- Scottish Oceans Institute/NERC Sea Mammal Research Unit (St Andrews) (March 2012)
- Decom North Sea (March 2012)
- Aberdeen Grampian Chamber of Commerce (April 2012)
- FLTC (April 2012)
- Greenpeace Research Laboratories (April 2012 with further discussions in 2013)
- RSPB (April 2012)
- JNCC with Marine Scotland (April 2012)

These are summarised in the following section. A further meeting was also held with DECC's Environmental Management Team in April 2012 to discuss the points raised in the workshop presentations in more detail as part of a general update session since they were unable to be present at the March stakeholder workshop or the JNCC/Marine Scotland meeting held earlier in April.

¹⁷ See <http://www.cnri-northsea-decom.com/Stakeholder-Engagement.htm> Stakeholder workshop 14 March 2012, Aberdeen: final agenda; overview pre-read; slides from proceedings; report of proceedings

¹⁸ See Appendix 3: Comparative Assessment Workshop: Stakeholder Concerns and Expectations – Pre-Read

3.3 Stakeholder Workshop - Follow Up Meetings

3.3.1 Scottish Oceans Institute/NERC Sea Mammal Research Unit (St Andrews) (March 2012)

A meeting was held with a representative from the Scottish Oceans Institute (SOC) and NERC Sea Mammal Research Unit of St Andrews University to provide a summary overview of the information shared at the stakeholder workshop and to answer any queries arising.

Within the discussion which followed, it was made clear that one of their key areas of interest was the approach to the drill cuttings pile since where jacket footings could be left in place this could have the advantage of protecting cuttings piles from disturbance and therefore obviate the potential for related marine contamination problems which they were anxious to avoid.

The issue of habitats provided by subsea infrastructure and the potential for their loss as a result of removal of structures was another concern, particularly given the limited scientific research existing on this. Following the meeting, CNRI provided video footage of the Murchison jacket legs from the most recent platform survey for informal review of biological communities and as a precursor to potential further study.

3.3.2 Decom North Sea (March 2012)

Building on the discussions both at the stakeholder workshop and on regular contact at industry events and meetings, CNRI met with Decom North Sea to discuss potential opportunities for further engagement with the supply chain.

CNRI identified three separate needs for such engagement, notably in relation to 1) Murchison decommissioning; 2) longer term initiatives to stimulate interest in and awareness of future needs to persuade contractors that it is worth investing in the development of new technologies and/or thinking about the transferability of skills to decommissioning applications to increase market opportunities; and 3) reuse opportunities which could fulfil environmental, cost and market goals.

Decom North Sea were keen for CNRI to share details of contracting strategies with the supply chain at an early stage, although there was understanding that this could be commercially sensitive. Timing would be a matter of judgement. It was agreed that if an engagement session were to be held with the supply chain it would need to focus on the scope of the removals and the anticipated timeline, if it were to be of value. Ideas were discussed which Decom North Sea took away to consider further. These were subsequently developed by Decom North Sea into a flagship industry event in March 2013, Decom Offshore 2013, for which CNRI contributed further to the preparation, presentation and participation.

It was also agreed that links with other industry and enterprise organisations would be of benefit – something that CNRI was already pursuing through participation in industry events, speaking opportunities and conference attendance.

3.3.3 Aberdeen Grampian Chamber of Commerce (April 2012, February 2013)

A meeting was held with the (then) Executive Chair of the Aberdeen Grampian Chamber of Commerce as a follow up to the stakeholder workshop in March to more fully understand intentions regarding well plugging and abandonment for the Murchison Field and also to explore how the Chamber could broker links with members and CNRI.

The Chamber of Commerce undertook to establish the possibility of running a decommissioning or re-use theme in its Business Bulletin and to discuss with Decom North Sea what interest might exist for a combined approach to stimulating local market for re-use of surplus equipment. Further, the stakeholder offered to use his local and oilfield business network to assess the feeling of contemporary companies regarding the interest in such an opportunity and revert back to CNRI with anything relevant that emerged.

A further meeting was held with the Chamber of Commerce in February 2013 to follow up on opportunities for collaboration, as a result of which a presentation on Murchison decommissioning programme contract opportunities was scheduled for Chamber members and others for June 2013.

3.3.4 FLTC (April 2012)

CNRI met with the UK Fisheries Offshore Oil and Gas Legacy Trust Fund Ltd (FLTC) to provide a briefing on the stakeholder engagement workshop which they had been unable to attend. (An initial introductory meeting had previously been held with the FLTC in August 2011.

Within the discussion, FLTC raised concerns about the suitability of buoyancy tank assembly methods of large jacket removal. The nature and extent of seabed debris around the platform and along pipeline PL115 in the context of potential risk to fishing risk was also explored and CNRI's plans for a debris clearance sweep (and verification) explained.

Discussion followed on how debris is currently logged and about the plans for a debris sweep post-decommissioning. FLTC undertook to consider the issue at the next meeting of the Seafish Industry Authority's technical body and to look at processes for information capture if not already in place. FLTC further advised that work was being done to establish whether data related to the oil and gas industry in Norway could be amalgamated into a comprehensive data set for the Northern North Sea.

FLTC made clear the desirability from a fishing perspective of a clean seabed, despite the heat and/or shelter advantages which infrastructure could provide to marine life.

There was further discussion of the concerns expressed to CNRI by the fishing community regarding trenching of pipeline PL115. FLTC observed that if the pipeline location was known and recorded on charts and the FishSafe system, fishermen using these should be alert to potential risks, as at present.

3.3.5 Greenpeace Research Laboratories (April 2012 and January, April, May 2013)

A meeting was held in April 2012 with Greenpeace Research Laboratories (referred to here as 'Greenpeace') who had been unable to attend the stakeholder workshop the previous month. This

centred on an overview of the key presentations which had been given at the workshop, including the comparative assessment methodology, and related discussion.

Greenpeace acknowledged that as far as review of the stakeholder workshop report was concerned, Murchison had better data for its operations than other platforms, but far less data on topsides contaminants than other operators at a similar stage. They were surprised that more information was not available, particularly in relation to NORM. CNRI confirmed that this was because the platform was still operational and that specific information would be gathered once oil production ceased as part of the Engineering, Down and Cleaning scope. Information is also held internally to CNRI on NORM and its history on Murchison, including Becquerel levels on what has been recovered and this would be useful in helping to inform the process of removal. Greenpeace further noted that NORM was mainly an issue with respect to disposal facilities.

The second area of discussion related to drill cuttings piles, particularly the degree of certainty about adherence to OSPAR Stage 1 thresholds and whether something was missing that could cause an exceedance. CNRI confirmed that it was reasonably confident on this but more concerned about what OSPAR doesn't cover, i.e. sampling deep within the pile. Greenpeace said that it shared this concern in relation to potential dispersal of unknown contaminants which was why there was concern about not proceeding to Stage 2 assessments. CNRI said that a Stage 2 assessment would be considered. (Stage 2 assessment was subsequently undertaken.)

Greenpeace asked specifically about the composition of drilling fluids used: whether alkylphenol ethoxylates (APEs) had been used and whether this was taken into account in the drill cuttings pile modelling. CNRI noted that the drilling fluid records and typical constituents had formed the basis of inputs to the modelling studies using SINTEF and explained the way in which the EIF Dream Partrack Model had been used to build the environmental risk assessment. Post-meeting follow-up of this point confirmed that APEs were not included in the modelling and that therefore predictions cannot be made about their fate from the modelling.

CNRI's approach to using new technology for decommissioning was also discussed, in particular the opportunity for changing the approach if new technology came through by 2016. CNRI clarified the position, i.e. that in its screening of opportunities for new technology unless there was a commitment for it to be built and/or bought by 2014, such options would not be explored since it would introduce too great a degree of uncertainty into the decommissioning programme overall. Delay over a longer period could lead to asset deterioration, compromising removal. Greenpeace asked why there was a departure from this approach on the jacket leg cutting technology and CNRI explained that, in this case, such technology was proven but needed to be scaled up to cope with the size of the Murchison jacket legs.

Cost issues were discussed and CNRI confirmed that the approach was not to rule out anything on cost grounds in undertaking the comparative assessment of options (in line with DECC guidance). That cost should not be the driver for decision making had also emerged as an issue at the stakeholder workshop. The comparative assessment would identify recommended options both with and without cost to confirm that it was not the driver for decision making.

Further meetings were held with Greenpeace in 2013 (January, April and May) to more fully explore the contents of the discussion draft of the report on the Environmental Assessment of Options for the Management of the Drill Cuttings Pile.¹⁹ Iterations of the report following the January and April meetings were subsequently shared for further discussion before the report was finalised after the May meeting. These included the results of additional modelling undertaken and revised presentation of the salient points regarding contaminants so that they could be presented in the most transparent and understandable manner possible. A modification was also to the Environmental Baseline Survey report to update and clarify analysis of data to take into account observations by Greenpeace.

CNRI also undertook to revisit questions regarding the presence of tributyltin (TBT) within the scope of the post decommissioning survey.

3.3.6 RSPB (April 2012)

CNRI met with RSPB Scotland in April 2012 since the organisation had been unable to attend the first stakeholder workshop. RSPB described its concerns about any potential impacts on bird life from decommissioning programmes, highlighting not only its responsibilities for coastal reserves on Orkney and Shetland (amongst other land holdings) but also drawing attention to those managed by several other organisations.

The principal area of concern centred on the drill cuttings pile and discussion was held regarding the nature of its contents. The potential impacts which could arise from any release of contaminants into the food chain (e.g. via plankton plumes and sand eels) from cuttings pile disturbance and/or natural degradation were highlighted in particular. RSPB acknowledged that the modelling methods (SINTEF) used by CNRI in the pre-planning studies were in standard use.

Onshore disposal of drill cuttings was considered by the RSPB to be a potential difficulty because of a lack of treatment centres; transportation to shore could also create significant numbers of vessel movements with the potential for impacts on water flows and air/water interface which could adversely affect birds, including flightless birds. CNRI noted RSPB's recommendation that assessment would be useful to identify whether there was an issue for birds if onshore disposal were to emerge as a recommended way forward.

In addition, drill cuttings reinjection possibilities would need to establish with certainty that if this option were adopted the drill cuttings would not be brought above the surface, in line with current restrictions. Any plans to propose that drill cuttings were left *in situ*, meanwhile, could usefully address the possibilities of using plasticized/alginate seals. CNRI undertook to explore this in the consideration of drill cuttings management options.

RSPB also recommended that, while not currently envisaged by CNRI, should any contractor propose the use of explosives during the removal of the jacket, it would be as well for vibration and noise impacts on sea mammals to have been fully addressed in advance. CNRI acknowledged the value of

¹⁹ MURDECOM-BMT-EN-STU-00132, available online at www.cnri-northsea-decom.com from the Decommissioning Programme page

this. In addition to the noise study conducted by CNRI, RSPB suggested that it would be useful to look at studies undertaken by the Scottish Association for Marine Science if explosives use were to be pursued.

RSPB also suggested that Scottish Natural Heritage be added to CNRI's list of consultees on Murchison decommissioning. This suggestion was taken up (see section 3.8.4).

3.3.7 JNCC with Marine Scotland (April 2012)

A meeting was held to brief the Joint Nature Conservation Committee (JNCC) on the information presented at the Stakeholder Workshop and discussions which followed since they had been unable to attend that event, and to go over any issues pertaining to the development of the pre-planning for the decommissioning programme. Marine Scotland were also present at the meeting. Georgia Baylis-Brown, an MSc student from the University of East Anglia who had commented in some detail on the scope of the environmental impact assessment for Murchison, was invited by CNRI to join the meeting as an observer to aid her studies.

A brief overview of the findings of the Environmental Baseline Survey which had been the subject of discussion the previous year was given as a follow up to the report which had already been provided to JNCC, Marine Scotland and DECC's Environmental Management Team earlier in the year.

No significant environmental risk was identified by those present at the meeting from the options outlined by CNRI. However, JNCC sought to fully understand the potential risk of disturbance to the drill cuttings pile and any release of its contents as a result of other operations (e.g. conductor, pipeline and bundles removal). CNRI confirmed that such risk would be covered in the assessment of environmental hazards and environmental impact assessment, reported in the Environmental Statement. Marine Scotland noted two particular challenges which would result from disposal of the drill cuttings for a 'remove to shore' option: first, the difficulties with suction dredging and the potential for water column contamination from backflushing following blockages; and, second, the high water to drill cuttings ratio.

The scale of the challenge of jacket removal was also discussed and to illustrate this further a copy of the original Murchison installation film from 1980 was subsequently sent to both JNCC and Marine Scotland.

3.4 Comparative Assessment – Incorporation of Stakeholder Views

Stakeholder views were reported to the specialist team of 30 CNRI staff and external consultants, observed by two of the Murchison Independent Review Consultants, present at the Comparative Assessment Workshop in May 2012 (described in more detail in Section 5 of the Comparative Assessment Report²⁰).

²⁰ Murchison Decommissioning Comparative Assessment Report – MURDECOM-CNR-PM-REP-00232

This workshop was the forum for bringing together the results and total weighted scores from the individual technical assessment and evaluation workshops held during the previous five months and considering the options to be taken forward. Pre-briefing on stakeholder issues was given to participants (see Appendix 3) in the form of a table collating the range of stakeholder views collected through CNRI's engagement programme, recording the issues and expectations gathered and identifying how and where concerns are (or would be) addressed.

A short presentation was made at the start of each agenda item at the workshop to reinforce to those present specific stakeholder concerns and priorities, set within the context of two overarching – and repeatedly restated – stakeholder expectations: “clean seabed” must be the starting point for option consideration; and “safety first” to ensure that safety rather than cost must drive decision making. These focused on:

Jacket

Potential contamination of the marine environment:

- Loss of marine growth during jacket transit (invasive species)
- Access to footings: drill cuttings disturbance during decommissioning (footings removal, falling objects)

Fishing impacts:

- Continued inaccessibility of current exclusion zone under the partial removal scenario
- Snagging risk from footings left in place (safety and societal issues) under the partial removal scenario

Drill cuttings

Potential for contamination of the marine environment:

- Species and food chain impacts arising from drill cuttings disturbance
- Inability to survey deep within the drill cuttings pile because of access issues means that theoretical modelling – while an established procedure – cannot be fully verified
- Possible long term persistence of contaminants and impacts that could arise from the drill cuttings pile if left *in situ* or redistributed

Fishing impacts:

- The continued inaccessibility of current exclusion zone contrary to early North Sea development promises that all infrastructure would be removed, made before OSPAR Decision 98/3

Pipeline

Environment and safety:

- Naturally occurring radioactive material (NORM) – potential environmental impacts in the context of onshore landfill disposal pressures

Fishing impacts:

- Snagging risks that could arise from trenching the hard clay seabed via the creation of berms (seabed ridges) between the lengths of pipeline sections currently covered with rock

Knowledge base:

- Is enough known about the structural integrity (of pipelines) to support proper consideration of all options?

3.5 Comparative Assessment - Follow Up on Stakeholder Concerns

In the period following the March 2012 Stakeholder Workshop, potential methods for sampling the entire depth of the drill cuttings pile were further discussed to identify how technical and structural challenges might possibly be overcome to address the need for greater knowledge of the contents. This discussion continued at the Comparative Assessment Workshop and follow up sessions.

A potential method of sampling has since been identified for implementation once the platform is no longer operational in order to validate the theoretical modelling of the pile. The outcome is described in more detail in the Comparative Assessment Report.²¹ Further discussions have since been held with other operators and specialist contractors to investigate the optimum methods and timings for achieving representative sampling with which to validate the theoretical modelling, both to reinforce understanding of the Murchison drill cuttings pile and those associated with other platforms.

An additional area of interest with respect to drill cuttings was also identified by CNRI which, while not deemed likely to affect the outcome was nevertheless considered desirable to complete the picture for CNRI and stakeholders. A study was therefore commissioned to better understand the impacts resulting from eventual collapse of the jacket footings in order to model the potential impacts on the drill cuttings pile centuries hence.²²

Furthermore, as part of ongoing engagement, the emerging recommendations from the initial Comparative Assessment Workshop and two subsequent related sessions were discussed at bilateral meetings with Marine Scotland (June 2012), JNCC (July and September 2012) and the Scottish Fishermen's Federation (SFF) (July and September 2012) prior to reporting back to the wider stakeholder group.

As a result of the discussions with JNCC and the SFF, CNRI undertook to re-examine the emerging recommendation for rock placement on the 19km oil export pipeline PL115 as opposed to cutting and lifting the 17 exposed sections along its length to a) understand more fully whether this would improve the safety risk to fishermen and b) to determine potential environmental impacts resulting from the introduction of new material compared with either removal or of a leave *in situ* option. The results²³

²¹ Murchison Comparative Assessment Report - MURDECOM-CNR-PM-REP-00225 (see 5.3.7)

²² Murchison Drill Cuttings Pile Modelling Disturbance of Drill Cuttings from the Collapse of the Structural Piles Report - MURDECOM-GEN-EN-REP-00240

²³ PL115 - Post Workshop Actions MURDECOM-CNR-PM-GTN-00226

demonstrated that the rock placement option remained the most appropriate recommendation, particularly when coupled with a series of safety and environmental mitigation measures.

After the September meeting with JNCC, CNRI also conducted a habitats assessment based on existing data for pipeline PL115. The assessment concluded that there were no Annex I Habitats present along the pipeline corridor.

3.6 Stakeholder Workshop (2) – November 2012 Report Back to Stakeholders

CNRI made a commitment at the Stakeholder Workshop in March 2012 to keep stakeholders informed of the outcome of the comparative assessment process on the options for the Murchison jacket, drill cuttings and pipelines.

A second Stakeholder Workshop was therefore held in Aberdeen in November 2012 to share and discuss the comparative assessment results, any stakeholder issues arising and 'next steps'.

The draft Comparative Assessment Report was provided to all stakeholders as a pre-read (whether or not they were planning to attend) charting the way in which CNRI worked to strike a balance of safety, environmental, societal, technical and economic aspects in identifying the options to be presented in the decommissioning programme. A commitment was made to address any issues which stakeholders considered material to the confirmation of the options to be taken forward prior to submission of the Draft Decommissioning Programme to DECC.

The workshop, once again facilitated by The Environment Council, sought to provide briefing and to answer questions through plenary and workgroup discussion sessions and to gain feedback to inform the way ahead. Stakeholders were also invited to contribute to shaping the agenda for the day, although no suggestions were received for this.

Comment on the recommendations was sought from all parties, whether or not they planned to or were able to attend the workshop. CNRI also offered opportunities for stakeholders to meet to discuss any aspect of the proposals.

The stated aims of the 8 November Stakeholder Workshop were:

- To update participants on the activities undertaken since the March 2012 stakeholder workshop, how stakeholder input had been taken into account and the process moving forward.
- To build understanding of the recommendations being proposed for the Murchison platform decommissioning following the comparative assessment and answer any outstanding questions.
- To hear and understand from stakeholders:
 - In respect of the comparative assessment for the Murchison platform, what else (if anything) needs addressing before submission of the Draft Decommissioning Programme;
 - Any issues outside of the scope of the comparative assessment which need to be incorporated into on-going planning.

- Collate the learning on issues arising from stakeholder engagement on platform decommissioning – both in terms of the *content* and the *process* to apply in future by CNRI and others.

In all, 29 external stakeholders attended the November workshop (see details at Appendix 3). One request for a follow up meeting was received from Aberdeen Grampian Chamber of Commerce who also sought clarification of some elements of the wording of the Draft Comparative Assessment Report.

A full (transcript) account of the meeting, including the presentations given by the CNRI team, together with a Summary Report collating points raised by stakeholders was produced and issued to all stakeholders before being published online.²⁴ One stakeholder responded to the circulation of the transcript to suggest that it might be useful for CNRI to follow up a workshop question on assessment of the potential impacts of a tsunami on the drill cuttings pile. This was examined by CNRI and findings recorded in a technical file note on the Murchison Decommissioning Risk Assessment Associated with Long-Term Presence²⁵.

It is worth highlighting the very positive evaluation of the stakeholder event which was given by external participants, included in the transcript report.

3.7 Additional Actions Arising

A core element of the Stakeholder Workshop was a session specifically designed to ascertain whether participants considered that there were any additional matters which needed to be addressed before submission of the Draft Decommissioning Programme. There were none: all of the queries and issues raised by stakeholders in this session had already been accounted for by the company and therefore CNRI responded to them immediately at the workshop.

CNRI also sought to establish whether there were any issues which, while outside of the scope of the comparative assessment process itself, needed to be incorporated into on-going planning for Murchison decommissioning. These are set out, together with CNRI's response, in the table below.

²⁴ www.cnri-northsea-decom.com/Stakeholder-Engagement-02.htm

²⁵ MURDECOM-CNR-EN-TFN-00003

Table 1: Stakeholder Issues and Responses

Issues	CNRI Response
<p>CNRI to consider how/whether to share the weighting information further.</p>	<p>The weightings for the five comparative assessment criteria (safety, environmental, societal, technical and economic) were described to participants on the day and a copy provided to the Health & Safety Executive immediately after at their request. Full descriptions of the methodology and procedure [Comparative Assessment Method Statement MURDECOM-CNR-PM-PRO-00081 and Comparative Assessment Procedure MURDECOM-CNR-PM-PRO-00136] are being made available for inspection on publication of the Draft Decommissioning Programme (see Section 4.1).</p>
<p>Show removal timescales as the start on an opportunity envelope; not a fixed point.</p>	<p>This will be made clear on the invitations to tender and clarified in the Draft Decommissioning Programme and in future external communications. This information is also published and will be updated monthly on the DECC Project Pathfinder website.</p>
<p>CNRI to consider providing more information on the timeline and tender process for its own project (and for the industry to consider a high level, industry-wide one) to help the supply chain 'get ready'.</p>	<p>Discussions have been initiated with organisations representing the supply chain, such as Decom North Sea and Aberdeen Grampian Chamber of Commerce, and information being disseminated through presentations at events organised in conjunction with industry groups. Communication will be extended as the programme moves forward.</p>
<p>Can the corrosion rate of the metal in the jacket footings and pipeline be accelerated sooner than 900 years? And is enhancing corrosion beneficial?</p>	<p>CNRI referred this back to its external engineering consultants on materials and corrosion who have advised that practicalities around adding an accelerated and/or chemical corrosive treatment and discharge to the subsea environment would not be likely to meet OSPAR or CHARM regulations. Installing a cathodic protection system in which the footing acts as a sacrificial anode could not be installed for practical reasons as the amount of anode material required is not viable.</p>
<p>Use consistent terminology: 'economic' (rather than 'cost' considerations).</p>	<p>Noted – to be applied where relevant and where it improves the sense.</p>

3.8 Other Stakeholder Engagement

Regular dialogue with interested parties has been a feature of the pre-planning for the Murchison decommissioning on a number of fronts. Updates and meetings beyond those described above which relate most particularly to the comparative assessment and options selection are therefore summarised here for the sake of completeness.

3.8.1 CNRI Employees and Contractor Crew (Offshore and Onshore)

Internal communications within CNRI has been an important focus of engagement for the project. This reflects not only the needs of platform crew for information on how and when they will be affected but also how decommissioning activity will be structured and thus impact on their working lives and wellbeing. Furthermore, the safe operation of the platform both in the lead up to cessation of production and during decommissioning itself is of paramount importance to CNRI.

To this end, in addition to involvement of platform representatives in the two stakeholder workshops, monthly visits to the platform have been undertaken by various members of the decommissioning team since January 2012. These have provided rounded opportunities to speak to crew collectively and in small groups, answering questions and reporting on project progress and intentions. Several project newsletters and bulletins have also been prepared to update platform crew and provide assurances on future opportunities, while articles provided for the in house e-magazine have provided insight for the broader CNRI workforce.

Contractor management companies responsible for provision of the Murchison crew were also given early notification of decommissioning pre-planning activity in November 2010. These companies also took part in a joint briefing with the CNRI Operations and Decommissioning teams in September 2011 which sought to reinforce CNRI's commitment to openness and transparency, sharing information as and when it becomes available, and to working closely with core crew to establish new opportunities post-decommissioning.

3.8.2 Murchison Partners

Regular meetings have been held with Wintershall Norge AS, CNRI's joint venture partners in Murchison. At the formal partner meetings held three times per year, increasing focus has been given to the pre-planning for Murchison and contact beyond these meetings at special workshops and briefings has also been increased to ensure understanding of the developing proposals and secure their commercial support as the programme development has progressed.

Wintershall representatives have also been present at both stakeholder workshops and fully involved in the comparative assessment process – notably the Comparative Assessment Workshop (May 2012) and two related follow up meetings (June and July 2012) where their technical expertise was usefully brought to bear on issues relating in particular to drill cuttings. They also attended two of the update meetings held with DECC (July and November 2012).

3.8.3 Government Departments (DECC)

CNRI have had regular meetings with DECC's Offshore Decommissioning Unit (ODU) (September 2010, March and September 2011, March, July and November 2012, and April 2013) which have primarily focused on progress updates of the pre-planning process leading up to the submission of the Draft Decommissioning Programme. DECC representatives from PILOT, the Environmental Management Team and Licensing have been present at some of these meetings.

DECC was represented at both stakeholder workshops in 2012 and an additional briefing was also conducted for a representative from the DECC Environmental Management Team in April 2012. This meeting also included discussion on the requirements for the application for the MCAA Licence at a later stage.

A separate engagement session was held in March 2012 with representatives from PILOT to discuss potential ways of sharing information from operators involved in decommissioning activities with the UK supply chain.

In addition, CNRI took part of an industry secondment programme organised by DECC to provide its offshore decommissioning officers with insight into the operations of companies preparing decommissioning programmes. As part of this, CNRI provided a member of the DECC team with the opportunity to spend two weeks observing the operations of the company's decommissioning team to gain a better understanding of the approach being taken to the Murchison project and in turn to build awareness of DECC's needs as regulator.

Overall, the contact with DECC has been very helpful in establishing the foundations for the comparative assessment of options and in guiding the gathering and incorporation of stakeholder views. It has also proved valuable for refining presentation of the decommissioning programme using the streamlined decommissioning template, developed as a result of a DECC/Decom North Sea collaboration and including input by CNRI and other operators. The Murchison application will be the first example of a derogation case being put forward using the new template.

3.8.4 Other Government and Regulatory Agencies

In addition to the meetings with JNCC, Marine Scotland and the DECC Environmental Management Team detailed elsewhere in this report, CNRI also met with the Health and Safety Executive in September 2011 to share details of pre-planning activity and to receive guidance on the nature of issues which would be faced as the project developed. The HSE highlighted two phases for action:

- 1) The need for reassurance and certainty during the pre-planning phase to ensure safe platform operations by keeping worry among crew to a minimum; and
- 2) Post-cessation of production, when new challenges and changes (especially upscaling of the personnel on board) will require careful management to ensure health and safety practices are of the highest standard and that wellbeing is not compromised.

The Health and Safety Executive also attended both Stakeholder Workshops.

Meetings were also held with the Scottish Environment Protection Agency (SEPA) to discuss radiological issues. At the first of these, in November 2012, CNRI gave an overview of the Murchison decommissioning status before discussion of specific radiological questions covering such matters as pile densitometer sources, NORM authorisations and variations, and the preparation of a radiological records summary for report back to SEPA post decommissioning.

SEPA subsequently provided written clarification to a number of radiochemical questions after the meeting as guidance for CNRI.

A further meeting was held in December 2012 to discuss the status of the densitometers on the Murchison jacket and the options for their decommissioning.

Contact was also established with Scottish Natural Heritage to ascertain the degree to which they wanted to be involved in the decommissioning planning, following the RSPB's suggestion that they be involved. Their preference was to feedback comment through JNCC, rather than through face-to-face engagement.

3.8.5 Statutory Consultees

An exploratory meeting was held with the Scottish Fishermen's Federation (SFF) in November 2011 to ascertain their preferences for engagement during the pre-planning phase. As a result of this, the organisation was invited to participate in relevant specialist workshops held as a precursor to the comparative assessment process. The SFF provided useful input to these regarding the potential impacts on the fishing community, particularly for pipeline options. To reinforce understanding of the issues facing the SFF and broader fishing industry concerns regarding safety, CNRI participated in a one day SFF-Oil and Gas UK briefing at Fraserburgh Harbour in March 2012.

Later, following the Comparative Assessment Workshop in May (described in sections 3.4 and 3.5), two meetings were held (July and September 2012) with the SFF to explore their views on emerging recommendations to be taken forward in the Draft Decommissioning Programme. As a result, additional analysis was commissioned by CNRI to examine in more detail the risk factors to fishermen, offshore and onshore personnel, based on both cut and lift and rock placement decommissioning options for the 17 exposed sections of the oil export pipeline PL115.

Contact was established and maintained with the National Federation of Fishing Organisations (NFFO) who also attended the first of the two stakeholder workshops.

Invitations were issued to the Northern Ireland Fishermen's Organisation and to Global Marine Systems for both stakeholder workshops and follow up materials provided, although no representatives were available to attend. Invitations for one-to-one briefings were offered but have not yet been taken up.

3.8.6 Industry and Environmental Umbrella Organisations

CNRI has been active in both sharing learning with and learning from industry partners and contractors during the pre-planning phase. Presentations have been given by CNRI on the Murchison decommissioning at numerous conferences and events including the annual PILOT Share Fair event (November 2010), Society of Underwater Technology Conference (December 2011 and March 2013), Subsea UK lunch and learn event (August 2012), Decom North Sea/OGUK conference (October 2011 and 2012), NOF Energy lunch and learn events (January 2011 and 2013), NPF North Sea Decommissioning Conference (February 2011, 2012 and 2013), Decom North Sea's Decom Offshore 2013 Conference (March 2013) and the North Sea Oil and Gas Summit (April 2013). Further opportunities, such as with the Energy Industries Council, were at the time of writing being organised for later in 2013.

Regular attendance at Decom North Sea and Oil & Gas UK decommissioning events and fora throughout the period since late 2010 have provided additional opportunities for both engagement with other operators and the supply chain on a formal and informal basis.

A learning visit to Sellafield was also conducted in November 2011 by members of the Murchison decommissioning team to gain insight into the approach to decommissioning undertaken by other industries. Participation in the Society of Underwater Technology conferences described above also provided useful perspectives on alternative approaches.

CNRI has also taken part in two Scottish Environment LINK events held in November 2012 (annual conference) and February 2013 (two of the Scottish Environment Week meetings at the Scottish Parliament). These provided opportunities to engage informally with members of the umbrella organisation's Marine Task Force (drawn from the environmental NGO community in Scotland), amongst others, and to reinforce the need for those with marine interests to play an active role in shaping the decommissioning debate through early engagement, despite the resource pressures which they face.

3.8.7 Supply Chain and Representative Organisations

Following completion of the initial study work, engagement sessions were held with the removal services contractors in November 2011 and a cross section of the potential decommissioning services contractors to seek their input on the following:

- CNRI's proposed base case for packaging the scope
- How well the scopes will be defined or what measures are recommended to improve definition
- The risks, how controllable they are and who should own them i.e. contractor or CNRI
- What remuneration structures would be appropriate e.g. lump sum, target cost, reimbursable

Similar engagement sessions were also held in October 2012 with well plugging and abandonment companies.

Formal engagement on the invitations to tender subsequently commenced in November 2012 with Tier 1 decommissioning service contract bidders. Informal discussions with Tier 2 and Tier 3 contractors have also been held, particularly at conferences and industry events as mentioned above.

All engagement has been conducted in line with CNRI's contracting procedures.

3.8.8 Commercial Partners with Infrastructure Links to Murchison

While it is beyond the scope of this report to describe the full details of contact with other operators of the subsea infrastructure on which Murchison depends, it is relevant to record here that regular contact has been undertaken with industry stakeholders to explore the impact of and arrangements for Murchison decommissioning on shared, interdependent or nearby facilities. This has included invitations to and participation in the two stakeholder workshops separate from the ongoing liaison undertaken by CNRI's commercial team to ensure understanding of the broader context.

Meetings have been held with BP as operator of the Northern Leg Gas Pipeline and of the Sullom Voe Terminal on the Shetland Islands via the Main Oil Line. Discussions have also been held and are ongoing regarding practical arrangements for and commercial agreements with Fairfield Energy (operators of the Dunlin Alpha platform), EnQuest (operators of the Thistle platform) and Taqa (operators of the Cormorant Alpha platform and the Brent System).

Discussions with Shell have also been held regarding the possibility of tie-backs to the Penguins Field for the provision of gas to Murchison, as well as regarding the Penguins Field pipelines which cross the Murchison oil export pipeline to Dunlin Alpha. These have been taken into account in the development of the Decommissioning Programme and with respect to the comparative assessment of options for pipeline PL115.

Commercial agreements will ultimately be the mechanism by which the decommissioning relationships will be managed with other operators.

3.8.9 Section 29 Non-Equity Notice Holder Companies

The Section 29 Non-Equity notice holder companies with on-going liabilities towards Murchison were notified in writing of CNRI's intention to commence pre-planning studies for decommissioning in autumn 2010, at which time telephone follow up was made to further explain intentions. The only company to respond to an offer of briefing was Maersk to whom an introductory presentation was given in September 2010.

Presentations were again offered to these companies on submission of the Draft Decommissioning Programme and launch of the statutory consultation.

4. FORMAL CONSULTATION

4.1 Statutory Consultation

In accordance with the procedure set out in the DECC Guidance Notes, submission of the Draft Decommissioning Programme triggers a statutory consultation as required under section 29 (3) of the Petroleum Act.

The statutory consultation for the Murchison Decommissioning Programme took place between 31 May and 12 July 2013. CNRI chose to extend the consultation to cover a six week period (rather than the 30 day minimum specified in the Guidance Notes) to ensure that all those with an interest had ample opportunity to comment.

The statutory consultees comprise:

- The National Federation of Fishermen's Organisations
- The Scottish Fishermen's Federation
- The Northern Ireland Fishermen's Federation
- Global Marine Systems Limited

Each organisation was contacted in advance of the start of the consultation to establish their preferences for hard and electronic copies of the documentation and the quantities required. The requirements from each were then fulfilled.

4.2 Broader Stakeholder Consultation and Notification

Stakeholders beyond the four statutory consultees were also invited to comment. These consisted of two distinct groups:

1. Stakeholders with whom CNRI has engaged to date, with emails sent to each to alert them to the start of the consultation and, two weeks before the closing date, to remind them of the deadline.
2. Others with a potential interest in the decommissioning proposals, alerted via public notices in The Times (UK edition); Edinburgh Gazette; Aberdeen Press & Journal and The Shetland Times. An example notice is reproduced in Appendix 5.

National, regional and trade journalists were also contacted by email to alert them to the consultation and the key proposals being put forward as an additional means of spreading the word. Further information was provided where requested.

Meanwhile, Members of Parliament and the House of Lords, Members of the Scottish Parliament and Members of the European Parliament with a known interest in the decommissioning sector were also advised of the start of the consultation and four face-to-face briefings were held. A presentation was also made by CNRI to the Norwegian Ministry of Petroleum and Energy because of the transboundary nature of the Murchison Field, attended by the company's co-venturers Wintershall.

Finally, many of DECC's own internal consultees and advisory agencies were notified of the statutory consultation by CNRI. While these were required to comment directly to DECC's Offshore

Decommissioning Unit, rather than to CNRI, the company nevertheless had engaged openly in the course of the preparation of the proposals with a number of these – for example, DECC's Environmental Management Team, the Health & Safety Executive and Scottish Executive as well as bodies including Marine Scotland and JNCC. As such, it was considered important to continue the engagement.

4.3 Provision of Documentation

The five principal documents²⁶ for the consultation – the Draft Decommissioning Programme, Comparative Assessment, Environmental Statement, Stakeholder Engagement Report and Independent Verification Report were all published online²⁷ and copies provided on CD and in hard copy form to those who requested them. The documents were also made available for inspection by members of the public in the reception of CNRI's Aberdeen office.

Given that the five consultation documents were the distillation of a much broader set of data and contained numerous references to reports, technical notes, specialist studies and other source material, CNRI undertook to provide copies of these to consultees who requested specific documents, including to other operators working on their own decommissioning proposals.

4.4 The OSPAR Commission

In view of the Draft Decommissioning Programme recommendation that the footings of the Murchison jacket remain *in situ* and the derogation application to the OSPAR Commission that would need to be made to support this²⁸, CNRI offered early-stage briefings to each of the Contracting Parties. The purpose was to ensure that any areas of particular interest could be investigated prior to any recommendation by the UK government for a derogation application to be made. France, Germany, Norway and The Netherlands accepted the offer and CNRI made presentations to each of these, answering questions spanning a range of issues. Where offered or requested, CNRI also provided source documentation to further elucidate on particular areas of discussion.

4.5 Consultation Results

The results of the statutory consultation on the Draft Decommissioning Programme were reported in the post consultation Draft Decommissioning Programme submitted to DECC in September 2013. The statutory consultees were broadly in agreement with the recommendations, raising only minor issues.

²⁶ A further document, the Environmental Assessment of Options for the Management of the Murchison Drill Cuttings Pile was also published online alongside these documents to provide additional insight into this aspect of the decommissioning.

²⁷ See the Decommissioning Programme page at www.cnri-northsea-decom.com.

²⁸ The recommendation for derogation will initially be considered by the UK Government who, if in agreement, will be responsible for submitting a derogation application to the OSPAR Commission in line with the requirements of OSPAR Decision 98/3.

A summary of the responses from statutory and other consultees appears in Table 2 below. Copies of the full correspondence between respondents and CNRI's responses appear in Appendices 6 and 7 of this report.

Table 2: Summary of Consultation Responses

Stakeholder Responses	Comments made in response to Murchison consultation
Statutory Consultees	
Global Marine Systems	<ol style="list-style-type: none"> 1. No comments from GMS who note that no cables are expected to be directly affected in immediate vicinity, but that if in the unlikely event that any interaction were unexpectedly to be necessary in the course of engineering the project then liaison with specific cable owners would be needed. 2. Assumption that MoD would be consulted or aware of the project and of the operations for any military cables that may be in the region. 3. Recommendation that when notice to mariners were arranged for the offshore works, then the Kingfisher Fortnightly Bulletin be updated to include details of the works to inform sea users.
National Federation of Fishermen's Organisations	<ol style="list-style-type: none"> 1. Considers the information and rationale behind the project to be informative and comprehensive. 2. Believes it imperative to get the correct balance between what is to remain on the seabed and its impact on future fishing operations. 3. The Federations both North and South of the border have expressed concerns on any part of the original structure remaining <i>in situ</i> but also understand the adverse environmental impact such complete removal would cause, e.g. disturbance of cuttings pile. 4. Restates preference for a structure that is visible (above surface) rather than one below sea level, despite understanding the restrictions on this matter, commenting that surface marker buoys or a fishing friendly structure could be placed over the remaining footings. 5. Feels that the decommissioning programme has been open, honest and informative and may well be the format for all other decommissioning programmes in the future.
Scottish Fishermen's Federation	<ol style="list-style-type: none"> 1. Appreciation of engagement expressed. 2. Pleased to note P&A intentions, also bundle removal. 3. Notes derogation application plans, restating SFF preference for legs to be cut above sea surface level. 4. Recognises interrelationship between drill cuttings and footings. 5. Pleased to note that tie-in spools will be removed and are content given the circumstances for remedial rock. placement over exposed sections of PL115, and keen for overtrawlability trials to be undertaken on completion of latter. 6. Notes plans to isolate gas export/import pipeline which forms part of NLGP and recognises that NLGP decommissioning does not form part of the Murchison decommissioning programme. 7. Reaffirmation of continued appreciation of the openness of dialogue to date and the wish to continue to work closely and positively with CNRI and the project team.

Stakeholder Responses	Comments made in response to Murchison consultation
Core Stakeholders	
Aberdeen Grampian Chamber of Commerce	<ol style="list-style-type: none"> 1. Advised that the Chamber had no further observations to make and acknowledging that comments made in November 2012 had been addressed and responded to by CNRI. 2. Considers that 'combined with the successful industry wide event held last month', the Chamber feels its input has run its course, though suggests that a further engagement in 2014 would be welcome to further explore the issues surrounding not just Murchison but other installations approaching decommissioning.
Greenpeace	<ol style="list-style-type: none"> 1. Appreciate opportunity to comment and for these comments to be considered by DECC and OSPAR CPs. 2. Express appreciation for the openness and transparency shown by CNRI during stakeholder consultation process and willingness to engage with Greenpeace on several occasions and at a detailed technical level, resulting in changes to documentation to make it clearer. 3. Reiterates full support for OSPAR Decision 98/3. 4. Expresses concerns over certain areas, where despite discussion with CNRI no resolution has yet been found: <ol style="list-style-type: none"> i) stresses that Greenpeace does not support the approach taken by OSPAR to evaluate acceptability of 'leaving in place' of cuttings piles set out under recommendation 2006/5, nor the 'very limited and highly simplistic' threshold criteria on which Stage 1 of that approach depends, citing serious limitations which do not extend beyond consideration of estimated release rates for total hydrocarbons and area persistence in a similar context (whereas CNRI data shows cuttings sampled to date contain many more contaminants of concern); ii) expresses concern that the OSPAR rules mean there is no formal mechanism or guidance under which contaminants identified by CNRI will be taken into account when considering the acceptability of cuttings management options, particularly contaminants on the OSPAR List of Substances for Priority Action; iii) Notes high hydrocarbon content of drill cuttings pile, though acknowledges that according to CNRI's calculations this does not result in estimated oil leaching rates in excess of Stage 1 threshold criteria under OSPAR Recommendation 2006/5. Also notes presence in cuttings pile of other 'priority contaminants', listing these and by extrapolation proposing that total quantities of these would be 'very substantial'. 5. Appreciates that CNRI have presented all the available data on the presence of contaminants in the drill cuttings pile as part of the documentation submitted, also that CNRI have noted the toxicological significance of some of these priority substances within the ES and elsewhere, including persistence (also mentioned by the IRC), but are 'deeply concerned' that this has not had an influence on the consideration of acceptability of the proposed management options for the cuttings since CNRI has only been formally required to consider the two OSPAR threshold criteria of leaching rate of oil and area persistence in reaching its conclusions on the proposed management option for the cuttings. Adds that there is a danger that information on contaminants will be overlooked as a result and ignored in consideration of the proposed decommissioning programme – something which Greenpeace would find wholly unacceptable and therefore calls on the UK authorities to fully take it into account. 6. Recognises that by adherence to OSPAR Recommendation 2006/5, CNRI can claim to have fulfilled formal requirements relating to the assessment of the drill cuttings pile under that legislation, making clear that Greenpeace's concerns therefore related to the inadequacy of 2006/5 and its implementing legislation itself in this context, and of its ability thereby to ensure in and of itself the protection of the marine environment and the proper implementation of the OSPAR Hazardous Substances Strategy. 7. Two additional concerns expressed: <ol style="list-style-type: none"> i) that drill cuttings reinjection was considered within the comparative assessment when this would not be a permitted activity under current legislation governing the dumping of wastes at sea, making clear that this restriction should be clear in all considerations of the options evaluated; and

Stakeholder Responses	Comments made in response to Murchison consultation
Greenpeace (continued)	<p>ii) without deeper coring of the drill cuttings pile the possibility remains that other patterns of contamination could be detectable at different points in the pile, stressing there would be additional value in obtaining greater characterisation of the cuttings pile in the future (in order to inform management options for the wastes once recovered from the seabed) once that becomes a technical possibility.</p> <p>States that Greenpeace has consistently reiterated that there should be a presumption to remove drill cuttings where it is technically feasible to do so and unless there are compelling reasons to justify a derogation.</p>
International Marine Contractors Association	<ol style="list-style-type: none"> 1. IMCA restated its position, as communicated to CNRI in 2012, that while it is relevant for IMCA to be kept abreast of progress on decommissioning, it should not be the conduit for discussions between operators and contractors regarding feasibility, planning for and carrying out such work and that industry should liaise direct with consultants on those issues directly without IMCA secretariat involvement.
Marine Conservation Society UK	<ol style="list-style-type: none"> 1. Assumes that for P&A, the Oil & Gas UK Guidelines for this are in line with OSPAR. 2. Supports topsides proposals. 3. Supports jacket removal and are disappointed that footings will be left in place, though accept providing it does not prevent access to the drill cuttings. 4. Opposes drill cuttings being left in place and believes that efforts should be made to recover drill cuttings as far as is feasibly possible. 5. Supports proposals for removing short early production pipeline bundles and associated subsea equipment. 6. Opposes the proposals to leave PL115 in situ and believes 'such debris, especially oil contaminated debris' should be removed. 7. Supports development and subsequent implementation of a recovery plan on completion of decommissioning and would like to be consulted on this.
Northern Lighthouse Board	<ol style="list-style-type: none"> 1. Make clear comments relate only to Shipping and Navigational Safety. 2. No objection to the preferred option of removal to -112m below LAT with the remaining footings being properly identified on Admiralty Chart BA295 and recorded within the FishSafe information system. 3. Notice(s) to Mariners, Radio Navigation Warning(s) and publication in appropriate bulletins will be required stating the nature and timescale of any works carried out in the marine environment relating to the decommissioning project. 4. On final completion of the decommissioning operations would require position of any remaining sub-sea structure(s) and pipelines to be communicated to the UKHO in order that the admiralty chart BA295 can be correctly updated as stated above. 5. Marking and Lighting will be recommended for each stage of the decommissioning process through the formal DECC application and licensing process, recognising that suspension of decommissioning operations may be required due to seasonal weather and meteorological conditions and therefore request they are informed prior to any suspension to enable proposal of suitable Marking and Lighting regime to inform mariners of any remaining obstructions. 6. All vessel(s) deployed for the programme should be marked and lit as per the International Regulations for the Prevention of Collisions at Sea. 7. Require that notifications of any movements regarding mobilisation and demobilisation of specialist vessels are sent to the NLB's Edinburgh office.
North Sea Commission	<ol style="list-style-type: none"> 1. Wrote to advise that 'Unfortunately we are not able to give a formal comment within the deadline, as we did not adopt a common response within our political group.' 2. Thanked CNRI for provision of information and ask to be kept updated on progress.
RSPB	<ol style="list-style-type: none"> 1. Expresses appreciation for the level and nature of public engagement by CNRI 2. Reiterates that while RSPB's starting point for consideration of site clearance is that restoration should be to the state existing before development commenced, the Society recognises that such an aspiration may be more hazardous to the environment and to human safety than what is actually proposed, and that Murchison qualifies as a derogation candidate. 3. Asks that RSPB be kept informed of the progress of the project and particularly if any significant changes should arise as a result of this formal consultation.

Stakeholder Responses	Comments made in response to Murchison consultation
S29 Notice Holders (zero equity)	
Exxonmobil A/S Norske Shell Statoil	<p>Each of the three companies replied in almost identical terms, namely that:</p> <ol style="list-style-type: none"> 1. Based on their interpretations of the Petroleum Act 1988, section 29, and Agreement between the Norwegian and UK governments relating to the Exploitation of the Murchison Field Reservoir, the companies have no responsibilities. 2. As such, the companies abstain from commenting on the Murchison Field DP, requesting that it is made clear that it is not submitted on behalf of them.
Maersk	Presentation made 8 August in response to invitation. Documentation made available to help inform one of their own decommissioning projects.
Commercially-linked Partners	
Fairfield Energy	<ol style="list-style-type: none"> 1. Table 1.6 of DP: preference for reference to 'operator' rather than 'owner' to be used as the heading to column 1 of table. 2. Figure 2.2 of DP: consider annotations numbered 1 and 2 on schematic are unnecessary and potentially confusing; also, that text below the schematic differentiating 'operator, operations, primary emergency response and integrity' to be unnecessary in the context of the DP, suggesting it would be clearer if the annotations 1 and 2 were completely removed and that the descriptions of PL-115 Limits be simplified by removing the limit lines that describe 'operations, primary emergency response and integrity'. 3. Minor typos highlighted - p45: remove 'of' between 'review [of] materials' within table entry for Greenpeace; p47 where 'marketing on Admiralty Charts' should read 'marking on Admiralty Charts.'
Other Operators	
ConocoPhillips Marathon Shell Taqqa Bratani	Requests made for copies of various documents to help inform their own projects. <i>(Details excluded from Appendix 7)</i>

5. APPENDICES

APPENDIX 1 External Stakeholder Organisations

APPENDIX 2 List of External Participants in the Stakeholder Workshop Held 14 March 2012

APPENDIX 3 List of External Participants in the Stakeholder Workshop Held 8 November 2012

APPENDIX 4 Comparative Assessment Workshop:

Stakeholder Concerns and Expectations Pre-Read

APPENDIX 5 Example of Public Notice

APPENDIX 6 Consultation responses from Statutory Consultees/CNRI Replies

APPENDIX 7 Consultation responses from Other Stakeholders/CNRI Replies

APPENDIX 1

External Stakeholder Organisations

Aberdeen and Grampian Chamber of Commerce
Aberdeen City Council
Aberdeen Harbour Board
Aberdeenshire Council
BP Exploration Operating Company Limited - NLGP
British Geological Survey
British Marine Federation
Capturing the Energy
CEFAS (Centre for Environment, Fisheries & Acquaculture Science)
Centre for Environmental and Marine Sciences
CNRI platform contractor crew
CNRI platform staff
DECC Head PILOT Secretariat
DECC Offshore Decommissioning Unit
DECC Offshore Inspectorate
Decom North Sea
DEFRA
Dutch Ministry of Infrastructure and Environment
East of England Energy Group
EIC (Energy Industries Council)
European Commission - Representation in Scotland)
Fairfield Energy
FLTC Services Ltd
Friends of the Earth Scotland
Georgia Baylis Brown, University of East Anglia
GL Noble Denton
Global MarineSystems Ltd
Greenpeace Research Laboratories
Health & Safety Executive (Offshore Safety Division)
Highlands & Islands Enterprise
Industry Technology Facilitator
International Marine Contractors Association (IMCA)
International Maritime Organisation

Jim Rae
JNCC
KIMO (Local Authorities International Environmental Organisation)
Lerwick Port Authority
Marathon Oil
Marine Conservation Society
Marine Scotland
Maritime and Coastguard Agency
National Federation of Fishermen's Organisations (NFFO)
National Oceanography Centre, University of Southampton
NOF Energy
NOGEP (Netherlands Oil and Gas E&P Association)
North Sea Commission
North Sea Regional Advisory Council
Northern Ireland Fishermen's Federation
Northern Lighthouse Board
Norwegian Petroleum Directorate
Offshore Contractors Association (OCA)
OGP
Oil & Gas UK
OLF (Norwegian Oil Industry Association)
OPITO
Plymouth Marine Laboratory
RF-Rogaland Research / IRIS-Biomiljo International Research Institute of Stavanger
Royal Yachting Association
RSPB Scotland
Scottish Association for Marine Science
Scottish Enterprise
Scottish Environment LINK
Scottish Executive (Radioactive Waste)
Scottish Fishermen's Federation (SFF)
Scottish Natural Heritage
Scottish Oceans Institute (University of St Andrews)
Sea Mammal Research Unit
SEPA (Marine Team)
SEPA (Radioactive Waste)

Shell UK
Shetland Oil Terminal Environmental Advisory Group (SOTEAG)
Subsea UK
TAQA Bratani Limited
The Crown Estate
TNO-MEP (Netherlands Organisation for Applied Scientific Research)
University of Aberdeen - Royal Institute of Navigation
University of Aberdeen Business School
Whale and Dolphin Conservation Society
Wintershall Norge AS
WWF
WWF Scotland

APPENDIX 2

List of External Participants in the Stakeholder Workshop held 14 March 2012

Name	Organisation
Elaine Robertson	Aberdeen City Council
George Yule	Aberdeen Grampian Chamber of Commerce
Danny Stroud	Aberdeen Harbour Board
Alistair Reid	Aberdeenshire Council
Alex Mateo	DECC (Offshore Decommissioning Unit)
Bill Cattanach	DECC (PILOT)
Erik Leslie	DECC (Offshore Inspectors)
Tracy Edwards	DECC (Offshore Inspectors)
Brian Nixon	Decom North Sea
Ben Zech	Dutch Ministry of Infrastructure and Environment
Scott McMillan	East of England Energy Group
Neil Mitchison	European Commission Scottish Rep
Katrina Wiseman	Highlands & Islands Enterprise
Gill Dubois	Health & Safety Executive
Pat Naylor	Health & Safety Executive
Sandy Stewart	Health & Safety Executive
Mike Taylor	Independent Review Consultancy
Cliff Johnston	Independent Review Consultancy
Jim Rae	Individual Member, Scottish Wildlife Trust
Anthony Onukwu	Industry Technology Facilitator
Harriet Bolt	KIMO
Tom Piper	KIMO
Calum Grains	Lerwick Port Authority
Derek Moore	Marine Scotland
Neaz Hyder	Maritime and Coastguard Agency
John Paterson	Murchison Platform
Peter Stuart	Murchison Platform
Alan Piggott	National Federation of Fishermen's Organisations
Alistair Corbett	BP Northern Leg Gas Pipeline
Archie Johnstone	Northern Lighthouse Board
Louise Ryan	Oil and Gas UK

Karen Craig	Scottish Enterprise
John Watt	Scottish Fishermen's Federation
Philip Gorvett	Shell UK
Elaine Ball	Shetland Oil Terminal Environmental Advisory Group
Alex Kemp	University of Aberdeen Business School
Kyrre Nese	Wintershall Norge AS

APPENDIX 3

List of External Participants in the Stakeholder Workshop held 8 November 2012

Name	Stakeholder Organisation
Danny Stroud	Aberdeen Harbour Board
Alistair Reid	Aberdeenshire Council
Alistair Corbett	BP Exploration Operating Company Limited - NLGP
John Paterson	CNRI platform contractor crew
Peter Stuart	CNRI platform staff
Julie Benstead	DECC Offshore Decommissioning Unit
Marian Bruce	DECC Offshore Decommissioning Unit
Brian Nixon	Decom North Sea
Sarah Hillyear	Decom North Sea
Terry Kimber	Fairfield Energy
Niall Scott	FLTC Services Ltd (UK Fisheries Offshore Oil & Gas Legacy Trust Fund)
Sandy Stewart	Health & Safety Executive (Offshore Safety Division)
Stewart Millar	Health & Safety Executive (Offshore Safety Division)
Luca Doria	Joint Nature Conservation Committee
Tom Piper	KIMO (Local Authorities International Environmental Organisation)
Calum Grains	Lerwick Port Authority
Emma White	Marathon Oil
Derek Moore	Marine Scotland
Stephan Hennig	Maritime and Coastguard Agency
Don Orr	Noble Denton
Camilla Løvaas Stavnes	North Sea Commission
Louise Ryan	Oil & Gas UK
Peter Gordon	RSPB Scotland
Karen Craig	Scottish Enterprise
John Watt	Scottish Fishermen's Federation
Professor Alex Kemp	University of Aberdeen Business School
Astrid Edvardsen	Wintershall Norge AS
Kyrre Nese	Wintershall Norge AS
Cliff Johnston	Xodus Group (Independent Review Consultants)

APPENDIX 4

COMPARATIVE ASSESSMENT WORKSHOP:

MURCHISON DECOMMISSIONING 10 May 2012

STAKEHOLDER CONCERNS AND EXPECTATIONS - PRE-READ

Introduction

Stakeholder engagement is a fundamental part of CNRI's approach to the development of a sustainable decommissioning programme for the Murchison platform and related subsea infrastructure.

The expectations and concerns of those with a range of interests in the approach to CNRI's planning and the eventual proposals which will eventually be submitted to DECC are of direct relevance to the development of a sustainable decommissioning programme.

Proper consideration and addressing of concerns has a direct bearing on the acceptance of the eventual option selected which will require demonstration of a rounded and inclusive approach. It also has a bearing on the corporate reputation of CNRI in line with the company's commitment to "*...doing it right... and with integrity.*" Ensuring that this first decommissioning project is properly developed and demonstrates to stakeholders that their concerns have been given thoughtful consideration and appropriate weight will impact on the confidence in other decommissioning activity which may take place in the future.

Purpose of this document

This document is designed to familiarise those participating in the Comparative Assessment Workshop on 10 May 2012 with the range of stakeholder views collected over the last 18 months through CNRI's engagement programme.

The matrix below records the issues and expectations which have been gathered and seeks to identify how and where concerns are being addressed.

Participants in the Comparative Assessment are requested to remind themselves of these concerns as a precursor to consideration of specific issues and expectations in assessing the options for jacket, drill cuttings, pipeline and pipeline bundles removal. There will be a short presentation at the start of each of these four option assessment sessions on 10 May to link specific issues to each of these.

Any queries or comments on the contents should be raised with Carol Barbone in advance of the meeting on 10 May.



CATEGORY	STAKEHOLDER ISSUE/EXPECTATION	COMMENT ON HOW THIS IS BEING ADDRESSED	WHERE IS/WILL THIS BE DETAILED?
Stakeholder engagement	Need for ongoing dialogue including with more environmental groups and fishing industry as options identified to enable informed comment	Dialogue continues and is designed to ensure participation from all stakeholders in the project across a range of sectors: the goal is to ensure balance, fairness and transparency	Stakeholder Programme Report
Stakeholder engagement	No single lobby group should have more influence than any other	Dialogue continues and is designed to encourage participation from all stakeholders in the project across a range of sectors: the goal is to ensure balance, fairness and transparency. Efforts are being made to ensure contributions are representative	Stakeholder Programme Report
Stakeholder engagement	Media plan/greater communication about the project	Acknowledged - the website will play a key role in information sharing, reinforced by stakeholder engagement	Stakeholder Programme Report
Stakeholder engagement	Reputational issues must be considered	Corporate reputational issues may influence decisions, but DECC guidance notes suggest that reputational issues should not be included in the CA process.	Stakeholder Programme Report
Stakeholder engagement	Unanswered questions must receive response	Acknowledged - the company is committed to answering all questions received openly and transparently and is active in seeking comment and questions from stakeholders in line with its commitment to transparency	Decommissioning Programme; Stakeholder Programme Report
Stakeholder engagement	More information on studies, timetable and programme, particularly on website, as plans develop	Information will continue to be provided through the website, with increased content, as the way forward becomes clearer	Stakeholder Programme Report
Stakeholder engagement	Options appraisal and outcome of comparative assessments and programme selection must explain reasoning for decisions to facilitate effective engagement	The CA process and subsequent Decommissioning Programme will do this	Comparative Assessment Report; Decommissioning Programme



CATEGORY	STAKEHOLDER ISSUE/EXPECTATION	COMMENT ON HOW THIS IS BEING ADDRESSED	WHERE IS/WILL THIS BE DETAILED?
Stakeholder engagement	More details of the decommissioning process (including costs) are needed to inform the less experienced and facilitate comment	Information will continue to be provided through the website, with increased content as the way forward becomes clearer	Stakeholder Programme Report
Stakeholder engagement	Account needs to be taken of Scottish independence issues and political/economic uncertainties	Acknowledged - though current legislation and guidelines must and will be adhered to until such time as there may be change. The Petroleum Act 1998, incorporating OSPAR requirements (OSPAR Decision 98/3), remains at the core of the development of the decommissioning programme	Decommissioning Programme
Stakeholder engagement	Precedents will be set by the Murchison decommissioning	Acknowledged - and furthermore the company is committed to ensuring that the precedent for the Murchison decommissioning is led by its corporate philosophy of " <i>...doing it right ... and with integrity</i> "	Comparative Assessment Report; Decommissioning Programme
Stakeholder engagement	IRC audit and verification should be shared to ensure transparency and build confidence	The decommissioning programme will incorporate the publication of a verification statement from the IRC	Decommissioning Programme
Stakeholder engagement	It would be useful to some for video footage of marine growth to be shared	Extensive video surveys have been undertaken and those interested in reviewing these can do so on request	On request
General	Verification of studies should go beyond the company	IRC verification has underpinned the development of plans for the project but all stakeholders and regulators will have the opportunity to review the decommissioning programme and relevant supporting studies used in the CA process as part of the formal statutory consultation	Decommissioning Programme
General	Long term liability must be addressed	The decommissioning programme will address this and will be agreed with the regulator. It is included in cost estimates and takes into account liabilities to safeguard the fishing community	Decommissioning Programme and further discussion with DECC



CATEGORY	STAKEHOLDER ISSUE/EXPECTATION	COMMENT ON HOW THIS IS BEING ADDRESSED	WHERE IS/WILL THIS BE DETAILED?
General	Need to learn from others' programmes	Co-operation with other oil and gas operators and the salvage and nuclear industries has played a key role in informing the approach to the project, both through formal mechanisms (e.g. conferences and published programmes, industry work groups and forums) and meetings with other operators/regulatory authorities. The company's decommissioning team has substantial experience gained from previous decommissioning projects	Decommissioning Programme
General	Need to capture long term feedback and lessons learnt for effective sharing with those to follow	A close-out report will be published at the end of the decommissioning process - anticipated c2019. In the interim, progress will continue to be shared through industry forums, conferences and other appropriate means to facilitate others' preparation for decommissioning	Post-decommissioning Close Out Report; Stakeholder Programme Report
General	There needs to be a good reason to leave anything in place: there will be reputational issues over anything less than clean sea bed. Maximum sustainability should be the goal	DECC's guidelines are based on a sustainability framework and require a balanced assessment to be struck between safety, technical, environmental, societal and cost factors. The CA will seek to achieve this, taking 'clean sea bed' as the starting point. Adherence to the CA methodology will identify the most sustainable option and will follow OSPAR Decisions and Recommendations, UK regulations and company policy	Comparative Assessment Report; Decommissioning Programme
Safety	Safety must be the primary consideration	Safety has the highest weighting within the CA process in reflection of its importance and is a core value for the company	Comparative Assessment Report; Decommissioning Programme



CATEGORY	STAKEHOLDER ISSUE/EXPECTATION	COMMENT ON HOW THIS IS BEING ADDRESSED	WHERE IS/WILL THIS BE DETAILED?
Safety	Workforce engagement and participation vital to safe and successful decommissioning with full training to handle new and emergency scenarios	Internal communications and engagement with the platform crew has gradually increased since the inception of the project and will continue to grow as the way forward becomes clearer, not least through personal contact on offshore visits by the decommissioning team and through the involvement of contractor management companies to ensure safe and smooth operations. Full training to meet the range of needs associated with the decommissioning process will be assured and dialogue to address individual needs and concerns will be provided, with appropriate follow up as required	Stakeholder Report; Programme Strategy Operational
Safety	Opportunities for consultation regarding onshore disposal of hazardous waste	This will depend on the final destination for waste and selection of contractors will require assurances on community concerns	Stakeholder Report Programme
Safety	Hazardous waste disposal must be fully addressed	Acknowledged - DECC, SEPA and HSE liaison together with compliance with all current regulations will underpin the development of the eventual way forward with individual contracting companies charged with the disposal process	Environmental Statement; Permits, Licences and Consents Register; Environmental Management System
Safety	Partial removal of jacket legs and pipelines left on the seabed could represent a hazard to non-UK/non-EU (e.g. Norwegian) fishermen if not in possession of relevant language versions of FishSafe, Kingfisher and other marine plotting systems	This is being explored further with the FLTC but initial soundings with the NFFO suggest this is not an issue. The SFF have offered to assist in non-UK stakeholder engagement	Stakeholder Report Programme
Safety	Absence of information on debris from within the 500m zone could be an issue	Regardless of the final option for jacket removal, all debris within the 500m zone will be removed and independent verification of a clean sea bed will be undertaken	Final Decommissioning Close Out Report



CATEGORY	STAKEHOLDER ISSUE/EXPECTATION	COMMENT ON HOW THIS IS BEING ADDRESSED	WHERE IS/WILL THIS BE DETAILED?
Safety	To plan successfully, contractors need to know what needs to be done and when, with the operator providing sufficient accurate information about the structure to be removed so it can be accessed and removed safely, as per IMCA's Decommissioning Contracting Principles	This information has been shared with the company's contracts team and specifications will be developed in accordance with these. Engagement with supply chain will ensure contractors know what work is coming up and has already included sessions to discuss views on contracting strategies. These will continue and will feed into an information pack to be released with invitations to tender.	Tender Packs
Safety	Compliance with certification and standards needs to be demonstrated and included in the safety case	Acknowledged - ongoing consultations with regulators (e.g. HSE) are taking place to ensure compliance	Risk Register
Environmental	The presence of <i>Lophelia pertusa</i> on the legs of the platform requires an assessment of the extent and distribution to present an interpretation of the significance of the occurrence	An assessment has now been carried out and JNCC advise that as <i>Lophelia pertusa</i> would not have occurred without the presence of the platform, mortality as a result of decommissioning operations will not be considered as an issue of significant concern for the EIA. Liaison with the operations team will be held to conduct another more up-to-date assessment in due course as part of platform weight analysis	Environmental Statement
Environmental	Contamination of the marine environment (including food chain) is considered to be the most important issue and modelling of the fate of contaminants encouraged	The EIA scope addresses this	Environmental Statement



CATEGORY	STAKEHOLDER ISSUE/EXPECTATION	COMMENT ON HOW THIS IS BEING ADDRESSED	WHERE IS/WILL THIS BE DETAILED?
Environmental	NORM will need to be fully addressed in the course of time: not many companies are good at dealing with this and precedents will be set by the way this is handled	Meetings with SEPA have been held to secure input on radiological issues. An internal file note on NORM and the history of the platform has been prepared, noting levels (in Becquerels) of what has been recovered. Cleaning work and intelligent pigging has been used to keep pipeline scale under control. Topsides will have to be examined separately on actual cessation of production as part of the Engineer, Down and Clean scope before removal begins	Environmental Statement;
Environmental	Legacy issues must be given full consideration and compared with the short-term impacts of the actual decommissioning work	The EIA scope incorporates acknowledgement of legacy issues and will be addressed in the CA process, as well as in the final decommissioning programme and liaison with DECC	Comparative Assessment Report; Decommissioning Programme
Environmental	Marine growth may fall off the jacket structure during transit to or at the demolition yard, which has the potential to introduce marine invasive species	The EIA scope was amended to incorporate assessment of this concern and a technical note prepared. The issue is being addressed in the CA process	Environmental Statement
Environmental	The potential for the jacket to act as an artificial reef providing shelter for fish and its removal could impact adversely on fish recruitment	The EIA scope has been amended to note this as a stakeholder concern	Environmental Statement
Environmental	Impacts associated with resource use and atmospheric emissions should be considered for all decommissioning options	This accords with the DECC guidance and an energy and emissions report has been prepared to inform the CA process	Comparative Assessment Report; Environmental Statement
Environmental	An environmental baseline survey should be undertaken to provide a more complete picture than initially provided by historical data	This has now been completed and is being used to inform the CA process	Comparative Assessment Report; Environmental Statement; ERT Survey Report
Environmental	Seabed disturbance of removal impacts (particularly those associated with drill cuttings) must be assessed, together with noise impacts	Acknowledged	Environmental Statement



CATEGORY	STAKEHOLDER ISSUE/EXPECTATION	COMMENT ON HOW THIS IS BEING ADDRESSED	WHERE IS/WILL THIS BE DETAILED?
Environmental	Need for recognition that transportation of drill cuttings onshore for landfill could be an issue in Scotland because of space limitations and energy/emissions during transportation; increased vessel movements could also have impacts on birds	Acknowledged	Comparative Assessment Report; Environmental Statement; Drill Cuttings Environmental Assessment
Environmental	Knowledge of what is inside the drill cuttings pile is a critical question to answer before decisions are made	This is acknowledged as a critical issue. It is difficult to access the core with current technology. To try to build the most accurate picture possible in the absence of suitable technology historic data has been used to model the pile core and its long term fate as it degrades. The location of the pile under the main jacket structure creates serious access problems for large coring devices. As such, assessment will be made on the basis of core samples and cuttings pile modelling to develop the best management option for assessment in line with OSPAR recommendations	Comparative Assessment Report; Environmental Statement; Drill Cuttings Environmental Assessment/Modelling Report; OSPAR Recommendation 2006/5
Environmental	Potential of jacket degradation to impact on drill cuttings pile 1000 years hence if derogation case	Assessment will be made on the basis of core samples and cuttings pile modelling to develop the best management option for assessment in line with OSPAR recommendations	Comparative Assessment Report; Environmental Statement; OSPAR Recommendation 2006/5
Environmental	Drill cuttings reinjection must be considered	The CA process reviews this option	Comparative Assessment Report



<p>Environmental</p>	<p>The possibility of contamination of nets/catches from the drill cuttings pile and spread of pile cuttings by nets must be considered</p>	<p>Marine Scotland advises that overtrawl field studies have shown little displacement of cuttings from fishing nets, while the SFF advises that fishing trials have resulted in the removal of debris with no oil contamination apparent on the nets. Documentation for the first of these studies is cited by OSPAR in its 'Assessment of the possible effects of releases of oil and chemicals from any disturbance of cuttings piles (2009 update) as 'FSR-ML. Fishing Gear Interference with Cuttings Piles beneath Oil Installations after their Decommissioning – the consequences for contamination spread; Fisheries Research Services Marine Laboratory Aberdeen (unpublished draft report finalised in 2000)'. References for the study cited by the SFF have been requested in order that this may be fully explored.</p>	<p>Environmental Statement; Comparative Assessment; Drill Cuttings Environmental Assessment</p>
<p>Technical</p>	<p>Partial removal could mean not that all 4 jacket legs have to be left in place but that the one sited in the cuttings pile could be left</p>	<p>On further assessment following the raising of this point it is considered that in a partial removal option there would be no benefit to be gained by removing three legs and leaving one in situ. The structural integrity around bracing is the primary concern</p>	<p>Comparative Assessment Report</p>
<p>Technical</p>	<p>Examination of other decommissioning programmes could inform this project, especially where difficulties encountered</p>	<p>Co-operation with other oil and gas operators and the salvage and nuclear industries has played a key role in informing the approach to the project, both through formal mechanisms (e.g. conferences and published programmes, industry work groups and forums) and meetings with other operators/regulatory authorities. The company's decommissioning team has substantial experience gained from previous decommissioning projects</p>	<p>Environmental Statement</p>
<p>Technical</p>	<p>Consultation with third parties (e.g. pipeline owners and other platform operators) is essential to successful development of plans</p>	<p>This is in progress</p>	<p>Decommissioning Programme; Commercial Agreements/Memoranda of Understanding</p>



CATEGORY	STAKEHOLDER ISSUE/EXPECTATION	COMMENT ON HOW THIS IS BEING ADDRESSED	WHERE IS/WILL THIS BE DETAILED?
Technical	More information on well P&A and residual liability issues is required	Acknowledged - and discussions with DECC will inform the eventual plan for long term liability	Decommissioning Programme
Technical	Future technology could provide answers to technical challenges further down the line - there could be a case for delaying decommissioning on this basis	Degradation of the platform over time in anticipation of new technologies is an issue in this regard. Engagement with the supply chain has been undertaken to establish new prospects for overcoming technical challenges and are being considered within limits. The focus to date is on exploring existing technologies or those with the backing to be successfully brought to market in order not to be let down during the decommissioning process, but liaison continues to take place in case viable solutions can be brought forward. New types of vessel and other technologies will be considered for future decommissioning activity	Stakeholder Programme Report
Technical	The use of proven technology is essential in identification of jacket removal	Technical assessment and the CA main session will address this	Comparative Assessment Report
Technical	Technical appraisal must be based only on the options for jacket removal but the main CA workshop must address potential effects on the cuttings pile in considering final jacket removal options	The CA main session will address this	Comparative Assessment Report
Technical	For pipelines, justification will be required to support any areas where knowledge is limited e.g. structural integrity of the pipelines	Acknowledged	Comparative Assessment Report
Technical	Potential technical issues relating to any pipeline trenching (which could impact on societal concerns) must be fully incorporated into the assessment of options	Technical assessment and the CA main session will address this	Comparative Assessment Report



CATEGORY	STAKEHOLDER ISSUE/EXPECTATION	COMMENT ON HOW THIS IS BEING ADDRESSED	WHERE IS/WILL THIS BE DETAILED?
Societal	Final destinations for materials and any economic benefits must be shared when final option identified	This will not be certain until the contracting process is complete but decisions will be shared through the stakeholder programme	Stakeholder Programme Report
Societal	Community concerns about onshore disposal of hazardous waste must be fully addressed	All onshore disposal will be fully compliant with regulations and contracts for disposal will require assurances about community concerns	Ongoing Stakeholder Engagement Programme; Environmental Management System
Societal	Work needs to stay local, preferably in the North East of Scotland and at least in the UK	Supply chain engagement is a key element of ensuring the best solutions for decommissioning are accessible and available, reinforced by an active programme with industry bodies and direct with contractors at home and abroad. Contracts will be awarded in accordance with company contracting principles within the scope of EU competition law.	Stakeholder Programme Report
Societal	Cumulative effects of any derogation case (for jacket and pipelines) must be considered especially for fishing interests	Acknowledged	Comparative Assessment Report; Environmental Statement
Societal	Employment opportunities from decommissioning opportunities must be considered, including training and the development of innovative technology	Acknowledged - socio economic effects are addressed within the CA process. In addition, communication with the platform crew will help to identify training needs and skills development issues. The development of innovative technology will be facilitated by ongoing liaison with the supply chain to identify needs and opportunities	Comparative Assessment Report; Decommissioning Programme; Stakeholder Programme Report
Societal	Supply chain opportunities need to be communicated effectively once option selected to open the market, including with representative trade bodies	Acknowledged - and this will build on the extensive information sharing with the supply chain and its representatives to date, both direct and through industry bodies such as Decom North Sea	Stakeholder Programme Report
Societal	Any trenching of pipelines must ensure proper backfilling to avoid clogging of nets with trenching spoil	Acknowledged - this will be factored into the comparative assessment and contracting strategy	Comparative Assessment Report



CATEGORY	STAKEHOLDER ISSUE/EXPECTATION	COMMENT ON HOW THIS IS BEING ADDRESSED	WHERE IS/WILL THIS BE DETAILED?
Societal	Pipeline plugging must be considered	This is subject to consideration within the technical assessments conducted as part of the CA process	Comparative Assessment Report
Societal	At the start of the oil boom fishermen were promised a clean seabed - this must not be forgotten simply because of cost.	DECC guidelines require a balanced assessment to be struck between safety, technical, environmental, societal and cost factors and the CA will seek to achieve this, taking 'clean sea bed' through full removal as the starting point.	Comparative Assessment Report; Decommissioning Programme
Societal	There may be significant fishing activity within the Murchison Field by vessels registered in countries outside the UK and must be incorporated into assessments	The EIA scope was amended to note this stakeholder response and a report into socio-economic impacts on fishing has been undertaken to take account of this	Comparative Assessment Report; Commercial Fisheries Socio Economic Impact Study
Societal	Partial removal of jacket legs and pipelines left on the seabed could represent a hazard to non-UK/non-EU (e.g. Norwegian) fishermen if not in possession of relevant language versions of marine plotting systems	Kingfisher Information Services advise that the five languages chosen for translation of data for FishSafe charts, online notices, information and downloads - the only project of its type in Europe - represented the key EU fishing nations working with the EU sector. The information was gained after consulting with both fishing and offshore oil and gas industries. FishSAFE is also widely promoted throughout the major fishing exhibitions of Europe and Kingfisher state that they receive excellent feedback from fisherman as to its importance and uptake. The SFF has offered to assist in non-UK stakeholder engagement in connection with the decommissioning programme through relevant organisations and trade bodies	Stakeholder Programme Report



CATEGORY	STAKEHOLDER ISSUE/EXPECTATION	COMMENT ON HOW THIS IS BEING ADDRESSED	WHERE IS/WILL THIS BE DETAILED?
Economic	Cost must not drive decision making at the expense of safety (though the ALARP principle can be used to inform assessment of options)	DECC guidelines require a balanced assessment to be struck between safety, technical, environmental, societal and cost factors (with cost only acceptable as the main driver IF all other matters show no significant difference). Nevertheless, the company's own CA process acknowledges the importance of safety. The use of the ALARP principle is noted.	Comparative Assessment Report
Economic	Economic criteria, if incorporated in the full CA procedure, will require sufficient assessment of option scoring to avoid being compromised by confidentiality restraints. Publication of economic criteria is desirable in the interests of transparency	Acknowledged. This will be considered	Comparative Assessment Report

APPENDIX 5

Example of Public Notice (wording reproduced overleaf)

1334 THE EDINBURGH GAZETTE FRIDAY 31 MAY 2012

<p>The Secretary Northern Lighthouse Board 84 George Street Edinburgh EH2 3HA navigators@nlb.org.uk</p> <p>Scottish Fishermen's Federation 24 Rabbat's Terrace Aberdeen AB10 1XF j.yes@scf.co.uk</p> <p>Any other persons or bodies known or believed by the applicant to own or otherwise possess interests in the seabed or subsoil along or within 100 metres either side of the proposed course of the pipeline including accesses of blocks to be traversed by the line.</p> <p>Details (inc. email addresses) of any other persons or bodies served notices should be supplied to DECC. (27)</p> <p>PUBLIC NOTICE THE PETROLEUM ACT 1998 MURCHISON FIELD DECOMMISSIONING PROJECT</p> <p>CNR International (UK) Limited has submitted for the consideration of the Secretary of State for Energy and Climate Change, a draft Decommissioning Programme for the Murchison Field 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.</p> <p>The items/facilities covered by the Decommissioning Programme are: The Murchison installation and associated facilities located 150km north east of the Shetland Islands in UK Block 21119 of the United Kingdom Continental Shelf, 21m from the UK/Norway median line. The field extends into a Norwegian Block 339. The facilities comprise a steel platform and drill cuttings pile and the pipelines installed to extract hydrocarbons.</p> <p>CNR International (UK) Limited hereby gives notice that a summary of the Murchison Decommissioning Programme can be viewed online at www.cnr-international-decom.com (see 'Decommissioning Programme' page).</p> <p>Alternatively, a CD version of the programme can be requested or hand copy inspected at the following location during office hours: CNR International (UK) Limited St Magnus House Guild Street Aberdeen AB11 6NT Contact: Carol Barbone 01224 303192 carol.barbone@cnrinternational.com</p> <p>Representations regarding the Murchison Decommissioning Programme should be submitted in writing to Carol Barbone at the above address where they should be received by the consultation closing date, 12 July 2012, and should state the grounds upon which any representations are being made.</p> <p>31 May 2012 Carol Barbone Sustainability and Compliance Lead (Decommissioning) CNR International (UK) Limited St Magnus House, Guild Street Aberdeen AB11 6NT</p>	<p>National Federation of Fishermen's Organisations 30 Newgate York YO1 1TF www.nffo.org.uk</p>
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Environment

Environmental Protection

East Ayrshire Council

PLANNING AND ECONOMIC DEVELOPMENT

THE TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2011

NOTICE UNDER REGULATION 17

The proposal development at Whitshields, David, East Ayrshire is subject to assessment under the Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2011. Notice is hereby given that an environmental statement has been submitted to East Ayrshire Council by e-Gen Partners Ltd relating to the planning application in respect of the erection of 1 wind turbine, 57.7 metres to tip height and associated infrastructure (to be known as the Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2008 on 19 November 2012.

Possible decisions relating to the application are:
(i) approval of the application without conditions
(ii) approval of the application with conditions,
(iii) refusal of the application.

A copy of the environmental statement, the associated application and other documents submitted with the application may be inspected at all reasonable hours at the place where the register of planning applications is kept by the planning authority for the area at The Johnnie Walker Bond, 15 Strand Street, Kilmarnock, KA1 1HU and a <http://planning.east-ayrshire.gov.uk/online/> during the period of 28 days beginning with the date of this notice.

Copies of the environmental statement may be purchased from The Energy Workshop Ltd, The Media Centre, 3 Northumberland Street, Fuddlesfield, West Yorks, HD1 1SL at a cost of £50 for paper copies and is available on CD.

Any person who wishes to make representations to East Ayrshire Council about the environmental statement should make them in writing within that period to the Council at The Johnnie Walker Bond, 15 Strand Street, Kilmarnock, KA1 1HU or at <http://planning.east-ayrshire.gov.uk/online/consulting-representations> 12:00:00.

Alan Webb, Head of Planning & Economic Development, The Johnnie Walker Bond, 15 Strand Street, Kilmarnock, KA1 1HU. Tel: 01303 526700 Fax: 01303 524592 (29)

Aberdeen

POLLUTION PREVENTION AND CONTROL (SCOTLAND) REGULATIONS 2012

In accordance with paragraph 2 of schedule 1 to the Pollution Prevention and Control (Scotland) Regulations, notice is hereby given that the above has been applied to the Scottish Environment Protection Agency (SEPA) for a permit under Regulation 15 of the regulations. This is in respect of activities being carried out namely to undertake Metal Coating in an installation at Nigg Energy Park, Nigg, Ross-shire, IV19 1QY.

The application contains a description of any foreseeable significant effects of emissions from the installation on the environment and on human health.

The application may be inspected, free of charge, at SEPA Grainger House, Fodderty Way, Dingwall, IV15 9XB from Monday to Friday between 9.30am and 4.30pm. Please quote reference No PPU/1111498. Please note that the application contains details of:

- The applicant and the site;
- The activities carried out;
- The installation and any directly associated activities;
- The raw and auxiliary materials, other substances and energy to be used or generated;
- The nature, quantities and source of foreseeable emissions from the installation;
- The techniques for preventing, reducing and controlling harmful emissions from the installation;
- How the best available techniques are applied to the operation of the installation;



CNR International
(25)

PUBLIC NOTICE

Petroleum Act 1998

MURCHISON FIELD DECOMMISSIONING PROJECT

CNR International (UK) Limited has submitted, for the consideration of the Secretary of State for Energy and Climate Change, a draft Decommissioning Programme for the Murchison Field 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 items/facilities covered by the Decommissioning Programme are:

The Murchison installation and associated facilities located 150km north east of the Shetland Islands in UK Block 211/19 of the United Kingdom Continental Shelf, 2km from the UK/Norway median line. The field extends into Norwegian Block 33/9. The facilities comprise a steel platform and drill cuttings pile and the pipelines installed to export hydrocarbons.

CNRI International (UK) Limited hereby gives notice that a summary of the Murchison Decommissioning Programme can be viewed online at www.cnri-northsea-decom.com (see 'Decommissioning Programme' page).

Alternatively, a CD version of the programme can be requested or hard copy inspected at the following location during office hours:

CNR International (UK) Limited
St Magnus House
Guild Street
Aberdeen AB11 6NJ

Contact: Carol Barbone 01224 303102
carol.barbone@cnrinternational.com

Representations regarding the Murchison Decommissioning Programme should be submitted in writing to Carol Barbone at the above address where they should be received by the consultation closing date, 12 July 2013, and should state the grounds upon which any representations are being made.

31 May 2013

<p>Carol Barbone Stakeholder and Compliance Lead (Decommissioning) CNR International (UK) Limited St Magnus House, Guild Street Aberdeen AB11 6NJ</p>	
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APPENDIX 6

Consultation Responses from Statutory Consultees / CNRI Replies

From: Wrottesley, John (GMSL) [mailto:John.Wrottesley@globalmarinesystems.com]
Sent: 18 July 2013 11:16
To: Carol Barbone
Subject: RE: MURCHISON DECOMMISSIONING - STATUTORY CONSULTATION

Hi Carol,

Many thanks for your email – my sincere apologies that you have had to chase but it's been a very busy period lately, but fortunately I have no significant response for this programme.

I have not received any further comments from colleagues, and don't have any specific comments on the programme of works itself as no cables should be directly affected in the immediate vicinity, and if any interaction were unexpectedly to be necessary in the course of engineering the project, then it would be necessary to liaise with specific cable owners. However I think it is unlikely due to the proximity of the platform from any current known cables. I assume that the MoD would be consulted or aware of the project and would be aware of the operations for any military cables that may be in the region.

I would recommend that when notice to mariners were arranged for the offshore works, then the [kingfisher fortnightly bulletin](#) be updated to include details of the works to inform sea users.

If you require anything else from myself then please let me know – I will be available today and tomorrow and will ensure I respond quickly if you need anything else.

Kind regards,

John



CNR International

Mr John Wrottesley
Permitting Manager
Global Marine Systems Ltd
New Saxon House
Winsford Way, Boreham Interchange
Chelmsford
Essex CM2 5PD

14 August 2013

Dear John

Murchison Draft Decommissioning Programmes Consultation

Further to my email acknowledging receipt of your response to the draft Murchison Decommissioning Programmes, I am writing now to respond formally on how we are addressing the points you covered.

I can confirm that your expectation that no cables should be directly affected in the immediate vicinity of the area where works will be carried out concurs with our own, and that if any interaction were unexpectedly to be necessary in the course of engineering the project then liaison with specific cables would be undertaken.

Meanwhile, we are taking advice from DECC with regard to consultation and briefing of the Ministry of Defence to ensure that they are both aware of the proposed decommissioning programmes and associated works with respect to any military cables that might be in the region.

As far as notice to mariners is concerned ahead of offshore works, we will arrange for provision of information to the Kingfisher fortnightly bulletin to ensure that users of the sea are kept informed. A note to this effect confirms this intention in the post-consultation Decommissioning Programme.

Thank you once again for your comments which are helpful in refining the decommissioning proposals.

Kind regards

Carol Barbone
Stakeholder & Compliance Lead

From: Alan Piggott [mailto:Alan@nffo.org.uk]
Sent: 18 July 2013 08:25
To: Carol Barbone
Subject: Murchison Decom

Morning Carol

Please excuse my tardiness on this topic and see comments below;

The Federation has been involved with the decom program of the Murchison Platform and infrastructure and found the information and rationale behind the project to be informative and comprehensive.

We believe it to be imperative to get the correct balance between what is to remain on the seabed and its impact on future fishing operations.

The Federations both North & South of the boarder has expressed their concerns on any part of the original structure remaining in situ but also understand the adverse environmental impact such complete removal would cause (disturbance of cutting piles ect).

As practical fishermen we would rather have a structure we could see (above surface) than one below sea level, understanding the restrictions on this matter our only comment would be to suggest surface marker buoy's or a fishing friendly structure to be placed over the remaining leg stumps of the Murchison.

Having said that the Federation feels that this program of decommissioning has been open, honest and informative and may well be the format for all other decom programs in the future.

Best Regards

Alan Piggott

General Manager

National Federation of Fishermen's Organisations

30 Monkgate
York
YO31 7PF

Tel: +44 (0) 1904 635432
Fax: + 44 (0) 1904 635431
Mobile: +44 (0) 7803 607330
Email: apiggott@nffo.org.uk
Website: www.nffo.org.uk



CNR International

Mr Alan Piggott
General Manager
National Federation of Fishermen's Organisations
30 Monkgate
York YO31 7PF

14 August 2013

Dear Alan

Murchison Draft Decommissioning Programmes Consultation

Further to my earlier email acknowledging receipt of your response to the draft Murchison Decommissioning Programmes, I am writing now to respond formally to your points.

We thank you for your comments describing the information and rationale behind the decommissioning programme as informative and comprehensive and we are grateful for the role which you have played in enabling us to achieve this through your participation in discussions over the last two years. We are also appreciative of your remarks regarding the approach we have taken during the development of the plans and suggestion that this may set a precedent for others.

With regard to achieving the correct balance for the programme and its impact on future fishing operations, your understanding of the balance to be struck between fishing impacts from any elements of the structure which may remain on the seabed and the adverse impacts that complete removal would cause is helpful.

However, while we understand your preference for a visible (above surface) structure despite the restrictions which prevent this, we would have serious reservations about the safety implications of the rapid deterioration of the structure at the splash zone and subsequent collapse and the potential for more serious damage to vessels just below the water line once it were no longer visible.

We do not consider the idea of a fishing friendly structure to be a practical one in the case of Murchison, not least because of the longevity such a structure would need to have. Similarly, surface marker buoys could do more harm than good by providing a false sense of security because of the 'drift' that might occur as a result of tidal differences and the very deep water of the Murchison Field.

As such, we consider that safety of all users of the sea would be better served by ensuring proper marking of Admiralty Charts, with entry of data on any elements of the structure left behind into the FishSafe System and, following the overtrawl trials we intend to carry out, through word-of-mouth between fishermen involved in the trials and their peers.

Please do come back to me if you would like to discuss this further or if you would find it helpful to meet again in person.

Kind regards

Carol Barbone
Stakeholder & Compliance Lead



Our Ref:

Your Ref:

20th June 2013

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

Carol Barbone
Decommissioning Consultant
CNR International (U.K.) Limited
St. Magnus House
Guild Street
Aberdeen
AB11 6NJ

Dear Carol,

**CNR International:
Murchison Field Decommissioning Programme (Consultation Draft Programme – May 2013)**

I refer to CNR International's Murchison Decommissioning Programme and the Consultation Draft Programme – May 2013 documentation.

As per our recent meeting of 5th June 2013 and the presentation provided by CNR, we once again place on record our appreciation of the general updates received to date and also the clear explanation of the processes that has led CNR to make its Murchison Field decommissioning recommendations.

The concerns of fishermen remain primarily that of safety and the physical impact on the fishing grounds of the long term presence of oil industry infrastructure on the seabed.

We are pleased to note that the associated subsea and platform wells are to be plugged and abandoned and that the short early production pipeline bundles and related items will also be removed.

We note that the Murchison steel platform itself will be subject to a separate derogation application under OSPAR Decision 98/3, where CNR's recommendation is for the jacket to be removed down to the top of footings at 44m above the seabed. We fully recognise the reasons provided for leaving the footing in situ on this particular occasion, but as stated during the course of our recent meeting, the SFF's preference in cases where Platform footings are not deemed feasible for removal is for the legs to be cut above sea surface level.

In relation to the drill cuttings pile located within the jacket footings, we note that the cuttings are within OSPAR thresholds for remaining in situ to degrade naturally with time and recognise the linkage here with the jacket.

Members:

Anglo Scottish Fishermen's Association
Clyde Fishermen's Association
Fishsalesmen's Association (Scotland) Ltd

Mallaig & North-West Fishermen's Association
Orkney Fisheries Association
Scallop Association

Scottish Pelagic Fishermen's Association Ltd
Scottish Whitefish Producers' Association Ltd
Shetland Fishermen's Association

VAT Reg. No: 605 096 748

With regard to the 19km main oil export pipeline (PL115), we are pleased to note that the tie-in spools at either end will be removed and are content given the circumstances (crosses under 4 other live pipelines and an umbilical crossing, wall thickness concerns plus 56% of pipeline already rock covered) for this surface laid line to be left in situ with remedial rock placement over exposed sections. Ideally, we would appreciate if fishing overtrawlability trials could be undertaken on completion of the remedial rock placement work.

It was further noted that the Murchison gas export/import pipeline which forms part of the Northern Leg Gas Pipeline (NLGP) system will be isolated at the Murchison subsea riser tie-in spool as part of the Murchison decommissioning work, but that the pipeline (PL165) is owned by the NLGP parties and does not form part of the Murchison decommissioning programmes.

The Federation having stated the above position, would reaffirm its continued appreciation of the openness of the dialogue hitherto and its wish to continue to work closely and positively with CNR International and your Project Team, as you work through the challenges before you.

Yours sincerely,



Steven Alexander
Director of Marine Operations

cc: SFF Sustainable Fisheries Committee



CNR International

Mr Steven Alexander
Director of Marine Operations
Scottish Fishermen's Federation
24 Rubislaw Terrace
Aberdeen AB10 1XE

14 August 2013

Dear Steven

Murchison Draft Decommissioning Programmes Consultation

Further to my earlier email acknowledging receipt of your response to the draft Murchison Decommissioning Programmes, I am writing now to respond formally to your letter.

We are grateful for your appreciation of the dialogue between our two organisations to date and are particularly aware of the value of the SFF's own role in contributing extensive knowledge to the development of our plans.

We fully understand that the concerns of fishermen remain primarily that of safety and the physical impact on the fishing grounds of the long term presence of oil industry infrastructure on the seabed. This has been incorporated at every stage of the development of the Decommissioning Programmes, most particularly in the comparative assessment process.

Your recognition of the interrelationship between the jacked footings and the drill cuttings pile is helpful. However, while noting the SFF's preference for the jacket legs of derogation structures to be cut above sea surface level, we are bound by OSPAR Decision 98/3 and International Maritime Organisation rules on this. Furthermore, we would have serious reservations about the safety implications of the rapid deterioration of the structure and subsequent collapse at the splash zone and the potential for more serious damage to vessels just below the water line once it were no longer visible.

With regard to the main oil export pipeline, PL115, we have taken on board your request for fishing overtrawlability trials to be undertaken on completion of the remedial rock placement work and this has been written into our Decommissioning Programme for the pipeline.

Like the Federation, we would also like to reaffirm our continued appreciation of the openness of the dialogue hitherto and our own wish to continue to work closely and positively with the SFF, whose experience has been of such importance in informing our understanding, as our project moves forward.

Yours sincerely

Carol Barbone
Stakeholder & Compliance Lead

APPENDIX 7

Consultation Responses from Other Stakeholders / CNRI Replies

Carol Barbone

From: Carol Barbone
Sent: 05 July 2013 05:59
To: 'Robert Collier'
Cc: jim smith; Kim.Stephen@agcc.co.uk
Subject: RE: CONSULTATION ON THE MURCHISON FIELD DRAFT DECOMMISSIONING PROGRAMME

Dear Robert

Thank you for your email confirming the situation. This is just to confirm that we would welcome the possibility of a further engagement session next year and will continue to liaise with Kim and Jim to achieve this. We will of course also keep you and your team updated on progress as we move forward.

Kind regards

Carol

From: Robert Collier [<mailto:robert.collier@agcc.co.uk>]
Sent: 02 July 2013 15:12
To: Carol Barbone
Cc: jim smith; Kim.Stephen@agcc.co.uk
Subject: FW: CONSULTATION ON THE MURCHISON FIELD DRAFT DECOMMISSIONING PROGRAMME

Carol

We have no further new observations. Our comments in the e-mail of 14th Nov 2012 at the feedback stage have been addressed and responded to by yourselves. Combined with the successful industry wide event held last month we feel our input has run its course.

Jim advises me that the general consensus post that event is that a further engagement next year would be welcomed to further explore the issues surrounding not just Murchison but other installations approaching de-commissioning and our colleague Kim is still in contact with you and Roy Aspen in this regard.

Robert Collier
CEO, AGCC

From: Carol Barbone [<mailto:Carol.Barbone@cnrinternational.com>]
Sent: 28 June 2013 19:38
To: Robert Collier; jim smith
Subject: FW: CONSULTATION ON THE MURCHISON FIELD DRAFT DECOMMISSIONING PROGRAMME

Dear Jim and Robert

Further to my email on 31 May advising of the launch of the Murchison Draft Decommissioning Programme, I just wanted to check whether you had any queries or would like to see any of the reference documentation in support of the proposals.

The consultation is due to close in two weeks, at the end of Friday 12 July, and I very much hope that you will be able to comment formally. This may be on aspects of the plans relevant to your own areas of interest, on the Murchison plans as a whole, on the approach we have taken during the pre-planning in order to fully capture the views and knowledge of stakeholders – or on a mix of these. It is important that we capture your views (and respond appropriately) not only in connection with the way forward on Murchison, but also as part of the learning journey for the oil and gas industry as a whole on decommissioning.

I very much look forward to hearing from you and am at the ready to provide further information as may be required.

Kind regards

Carol

From: Carol Barbone

Sent: 31 May 2013 08:44

To: 'robert.collier@agcc.co.uk'; 'jim.smith@agcc.co.uk'

Subject: CONSULTATION ON THE MURCHISON FIELD DRAFT DECOMMISSIONING PROGRAMME

Dear Jim and Robert

Further to our informal consultations over the last two years, I am writing to advise that CNR International (UK) Limited (CNRI) has today started the public consultation on its proposals for decommissioning the Murchison platform and pipelines when production from the Murchison field in the Northern North Sea ceases in early 2014.

The consultation runs to Friday 12 July and has been triggered by CNRI's submission of a draft decommissioning programme to the Department of Energy and Climate Change (DECC) in accordance with the provisions of the Petroleum Act 1998 and the government's Decommissioning Guidance Notes for Industry.

The Murchison platform is located 150km north east of the Shetland Islands (UK Block 211/19 of the United Kingdom Continental Shelf) and the field extends into Norwegian waters (at Norwegian Block 33/9). The facilities comprise a steel platform, drill cuttings pile and related pipelines and infrastructure.

Once the consultation is complete and CNRI has responded to comments and queries arising from statutory and other consultees, the company will formally submit its Stage 2 decommissioning programme to DECC.

A decision will then be made by the government on whether relevant elements of the Murchison decommissioning programme should be put forward for derogation status under the OSPAR Convention - the current legal instrument guiding international cooperation on the protection of the marine environment of the North-East Atlantic. The OSPAR Commission is made up of representatives of the Governments of 15 Contracting Parties and the European Commission, representing the European Union.

Such an application would relate to proposals to leave in place the steel 'footings' of the platform jacket. While normal practice is for the full removal of all platform facilities, Murchison qualifies as a derogation candidate under OSPAR Decision 98/3 because of the size of the platform (27,600 tonnes) and the early date of its installation (1979).

CNRI's intention is that oil wells would be plugged and abandoned and the 24,500 tonne topsides removed for onshore reuse, recycling or disposal. Removal methods for both the topsides and the jacket are yet to be determined and related contracts will not be awarded until the decommissioning programme has been confirmed by the Secretary of State, expected in mid 2014. The execution phase of the decommissioning programme is anticipated to take until 2019 to complete.

The Draft Decommissioning Programme itself follows a new streamlined format developed by DECC in partnership with the oil and gas industry and contains proposals for the Murchison platform's topsides and jacket, drill cuttings pile and pipelines. The programme is supported by four key documents as follows:

1. Comparative Assessment Report
2. Environmental Statement
3. Stakeholder Engagement Report
4. Independent Review Consultants' Final Verification Report

Copies of each of these, together with the Draft Decommissioning Programme, are accessible on the 'Decommissioning Programme' page of CNRI's website: www.cnri-northsea-decom.com. Alternatively, a CD version of the programme can be requested, or hard copy inspected at the following location during office hours:

CNR International (UK) Limited
St Magnus House
Guild Street
Aberdeen AB11 6NJ

Contact: Carol Barbone 01224 303102 carol.barbone@cnrinternational.com

Representations regarding the Murchison decommissioning programme should be submitted in writing to me at the above address by post or email by the consultation closing date, 12 July 2013, stating the grounds upon which any representations are being made.

Summary of proposals

The proposals contained in the Murchison Field Decommissioning Programme are as follows:

1. All platform and subsea wells will be plugged and abandoned in accordance with Oil & Gas UK Guidelines.
2. The platform topside modules will be removed and returned to shore for reuse, recycling or disposal.
3. It is recommended that the jacket be removed down to the top of footings (at 44m above the seabed) and returned to shore for reuse, recycling or disposal. The jacket footings would then be left in place.
4. The drill cuttings pile located within the jacket footings will be left *in situ* to degrade naturally with time, which is permissible under the rules contained within OSPAR Recommendation 2006/5.
5. The short early production pipeline bundles and associated subsea equipment will be removed and returned to shore for recycling or disposal.
6. The main oil export line (PL115) will be left *in situ* with remedial rock placement over exposed sections. The main pipeline tie in spools, at either end, will be removed and returned to shore for recycling or disposal.
7. The Murchison PL165 gas import riser will be decommissioned and isolated at the subsea riser tie-in spool as part of the Murchison Field decommissioning programme. This will be in preparation for the future decommissioning of PL165 by the NLGP System Owners.
8. On completion of the decommissioning programmes a seabed survey will be undertaken to identify oilfield related debris within the platform's 500m zone and a 200m wide corridor along each pipeline. All items of oilfield debris will be categorised and in consultation with DECC a management and recovery plan will be agreed. Following completion of the recovery plan, verification of seabed clearance by an independent organisation will be carried out.

I would be pleased to help provide any further information which you might require or answer any questions arising.

Kind regards

Carol

Carol Barbone
Decommissioning: Stakeholder & Compliance Lead
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Comments on MURCHISON FIELD DECOMMISSIONING PROGRAMME, MAY 2013

Submitted by Greenpeace, July 2013

We appreciate the opportunity to comment on the proposed decommissioning programme for the Murchison field and hope that the comments below will be taken fully into account by the relevant authorities (UK Government and, subsequently, other OSPAR Contracting Parties) when considering and reaching a decision on the acceptability of the proposed programme.

We would also like to express our appreciation for the openness and transparency shown by CNRI during the stakeholder consultation process, and their willingness to engage with Greenpeace on several occasions and at a detailed technical level. We welcome the fact that, following those consultations, a number of additions, clarifications and other amendments have been made to the documentation prepared in support of the proposed decommissioning programme, and feel that the details of the proposal are clearer as a result.

In relation to the decommissioning of the installation and associated infrastructure, Greenpeace reiterates its full support for OSPAR Decision 98/3 on the decommissioning of offshore installations and encourages all Contracting Parties to OSPAR to review any final proposals for derogation very carefully in order to ensure that all necessary considerations set out under that Decision have been taken into account by the operator and by the relevant UK authorities.

In relation to the options considered and ultimately proposed for the drill cuttings pile associated with the Murchison platform, Greenpeace would like to express a number of serious concerns. These concerns have been discussed in some detail with representatives of CNRI during the stakeholder consultation process but are points on which no resolution has so far been found. As such, they represent outstanding concerns relating to the proposed decommissioning programme, concerns which we hope will be taken into account by the UK Authorities and by other OSPAR Contracting Parties in considering the proposed programme.

In this context, Greenpeace would like to stress once again that we do not support the approach taken to evaluate acceptability of 'leaving in place' of cuttings piles set out under OSPAR recommendation 2006/5, nor the very limited and highly simplistic 'threshold' criteria on which Stage 1 of that approach depends. The OSPAR Recommendation requires consideration only of estimated release rates for total hydrocarbons, and area persistence in a similar context. Data presented by CNRI in the proposed decommissioning documents demonstrate unequivocally that the cuttings sampled to date contain many more contaminants of concern, in some cases at extremely high concentrations compared to background levels for the local marine environment and including persistent, bioaccumulative and toxic substances which are on the OSPAR List of Substances for Priority Action.

Greenpeace is deeply concerned that, despite the fact that the presence of this additional contamination has been known for some time and is clearly presented in the documentation submitted by CNRI in support of its proposed decommissioning programme, there currently appears to be no formal mechanism or guidance under which this information and its potential implications will be taken into account when considering the acceptability of cuttings management options. Despite their priority status, the OSPAR stage 1 threshold criteria do not include or require any

formal consideration of the presence and potential impacts of alkylphenols and their ethoxylates, organotin compounds, lead, cadmium or mercury, all of which are identified as significant components of the drill cuttings pile on the basis of the samples collected to date.

The drill cuttings pile associated with the Murchison platform clearly represents an accumulation on the seabed of highly contaminated waste. The total hydrocarbon content alone is very high (1.3-10.1 g/kg, or up to 1% by weight), though we understand that, according to the calculations that the operator have been obliged to carry out, this does not result in estimated oil leaching rates in excess of the Stage 1 threshold criteria under OSPAR Recommendation 2006/5. At the same time, however, the documents submitted by CNRI also note the presence in the cuttings pile of:

- 14.1 - 65.8 ug/g (ppm) total PAHs – some of which are noted in the Environmental Statement as having a “toxic nature (mutagenic/carcinogenic)...even at very low concentrations”;
- 574 - 1690 ng/g (ppb) total APEs – known endocrine disrupting substances
- 2.9 – 8.6 ng/g (ppb) organotin compounds – several hundred times above the OSPAR EAC
- 1.73 – 3.89 ug/g (ppm) mercury
- 0.99 – 5.74 ug/g (ppm) cadmium
- 279 - 3043 ug/g (ppm) lead

If these concentrations determined from the three core samples to date can be considered to be representative of the possible chemical characteristics of the cuttings pile as a whole (in the absence of any other empirical information), then given the estimated total mass of the cuttings pile of 39 679 tonnes (Table 9 of the Environmental Assessment of Options for the Management of the Murchison Drill Cuttings Pile), the total quantities of these priority contaminants which may be contained in the cuttings would be very substantial (e.g. approximately 559 - 2610 kg PAHs and approximately 22 - 67 kg APEs).

We appreciate the fact that CMRI have presented all the available data on the presence of these contaminants in the drill cuttings pile as part of the documentation they have submitted. We also appreciate the fact that they have noted the toxicological significance of some of these priority substances in the text of the Environmental Statement and other relevant documents and the potential for them to cause adverse effects and to persist as part of the chemical footprint of the cuttings pile for many hundreds of years. In fact, the Independent Review Consultancy report notes the potential for contamination to persist for hundreds or even thousands of years. The documentation also notes that, in pre-decommissioning surveys, a number of species were found in some abundance in close association with the cuttings pile (including crustaceans, echinoderms and polychaetes), indicating that there are possible pathways of direct transfer of contaminants from the cuttings pile into the food web that do not depend on passive leaching from, nor large-scale physical disturbance of, the cuttings pile.

Nevertheless, we are deeply concerned that none of this information has had any influence on the consideration of acceptability of proposed management options for the cuttings, as the operator has only been formally required to consider the two OSPAR threshold criteria of leaching rate of oil and area persistence in reaching its conclusions on the proposed management option for the cuttings.

There is a real danger, therefore, that the additional information which demonstrates the highly contaminated nature of the cuttings with priority substances will simply be lost in the technical documentation and therefore ignored in the process of considering the acceptability of the proposed decommissioning programme.

Given the widely recognised threats to the marine environment from PBT and endocrine disrupting substances and the status of several of the contaminants found in the cuttings in high concentrations as OSPAR Substances for Priority Action (for which the aim is the cessation of discharges, emissions and losses to the marine environment by 2020), Greenpeace would consider as totally unacceptable any exclusion of this information from detailed consideration as part of the options assessment. We therefore request that the UK authorities take this information fully into account in reviewing and reaching a decision on the proposed management option for the drill cuttings pile.

We recognise, of course, that by considering only the two simplistic thresholds set out in OSPAR Recommendation 2006/6, the operator can nonetheless claim that it has fulfilled its formal requirements relating to the assessment of the drill cuttings pile under that legislation. Our concerns therefore relate to the inadequacy of the OSPAR Recommendation and its implementing legislation itself in this context, and of its ability thereby to ensure in and of itself the protection of the marine environment and the proper implementation of the OSPAR Hazardous Substances Strategy. Given these limitations, it is vital in meeting their obligations for marine environmental protection that the UK authorities take full account of all of the information submitted and not simply the comparison against thresholds applicable to OSPAR Recommendation 2006/5.

In reviewing the documentation submitted in support of the proposed decommissioning programme, Greenpeace would like to highlight two additional concerns:

1. one of the management options under consideration for the drill cuttings within the comparative analysis was re-injection, which would not be a permitted activity under current legislation governing the dumping of wastes at sea (i.e. either under the OSPAR Convention or under the more global London Convention and Protocol). This point is noted by the Independent Review Consultancy report (*"However, if it proved technically possible, cuttings re-injection (CRI) could present a realistic environmental option; but would depend on regulatory acceptance as CRI is not currently permitted for existing cuttings piles"*), but as far as we have been able to determine, is not currently reflected in the other documents submitted by CNRI in support of the proposed programme. It is important that this restriction be clear in all considerations of the options evaluated.
2. the limitations to current knowledge of the cuttings pile as a result of limited extent and depth of sampling is another point noted by the Independent Review Consultancy report and once with which Greenpeace would concur. The information which is available is already sufficient to indicate that at least part of the cuttings pile is heavily contaminated with priority pollutants, but without deeper coring, the possibility remains that other patterns of contamination could be detectable at different points in the pile, especially as the pile was laid down over a long period during which there were many substantive changes in regulation and practice. We understand the practical limitations that have existed in preventing more extensive sampling while the main structure of the platform remains in place, but would stress that there would be additional value in obtaining greater characterisation of the cuttings pile in the future (in order to inform management options for the wastes once recovered from the seabed) once that becomes a technical possibility.

Greenpeace has consistently expressed the view, including during the stakeholder consultation process with CNRI, that there should be a presumption to remove drill cuttings where it is technically feasible to do so and unless there are compelling reasons to justify a derogation. Such an approach would be consistent with the approach taken within OSPAR Decision 98/3 with respect to the installations themselves and would avoid the otherwise simplistic judgments regarding acceptable

levels of ongoing pollution and impact below which companies can negate their long-term responsibilities for wastes previously generated. The volume, contaminated nature, complexity and uncertainties of the drill cuttings in the case of the Murchison platform add further weight to our position that the most responsible course of action is, in each and every case, to consider removal of wastes to shore for proper and controlled analysis, treatment and disposal as the default requirement, unless and until a compelling case can be made to the contrary.

We hope that these comments are useful in the further consideration of the decommissioning proposal.

David Santillo

Senior Scientist, Greenpeace Research Laboratories, 12th July 2013



CNR International

Mr David Santillo
Senior Scientist
Greenpeace Research Laboratories
Innovation Centre Phase 2
Rennes Drive
Exeter EX4 4RN

14 August 2013

Dear David

RE: MURCHISON DRAFT DECOMMISSIONING PROGRAMMES

Further to my earlier acknowledgement of receipt of your response to the draft Murchison Decommissioning Programmes, I am writing now to respond formally to your points.

We are grateful to you for responding to the consultation in such detail and appreciative of the input you have made during the discussions we have had with Greenpeace Research Laboratories over an extended period, most particularly in relation to the drill cuttings pile.

We would reiterate that like Greenpeace, CNRI fully supports OSPAR Decision 98/3. As far as OSPAR Recommendation 2006/5 is concerned, we note your concerns about the requirements for evaluating the acceptability of leaving in place drill cuttings piles and, as you anticipate, reconfirm that CNRI has fulfilled its responsibilities as currently required by the international community. This is clearly an issue for OSPAR and DECC to take up and I am therefore copying this letter and your original consultation response to both DECC and to Defra who lead the UK delegation to OSPAR for them to consider how they respond and advise. DECC will also want to form its own view of your remarks in its assessment of the Murchison Decommissioning Programmes.

Your penultimate point raises the matter of drill cuttings reinjection and the fact that this would not be a permitted activity under current legislation governing the dumping of wastes at sea. We concur fully with this view and the point is made in both the Executive Summary and Section 7¹ 'Conclusions of the Environmental Assessment of Options for the Management of the Murchison Drill Cuttings Pile and our Comparative Assessment Report² (s3.3.4, pg 68). I hope this reassures you of our position on this which is fully in line with that of our Independent Review Consultants.

On your final point, we would reiterate the full consideration given to a range of options for the drill cuttings pile, including removal to shore, summarised in section 3.3.4 of the Comparative Assessment Report. Our view remains that the outcome of the Comparative Assessment itself which identifies leaving the drill cuttings in situ to degrade naturally over time is sound and, balancing the key criteria, represents the best way forward.

Cont/...2

² "Excavation of the drill cuttings pile to the surface and reinjection of the cuttings material into a disposal well gives a favourable balance between the moderate short-term environmental risks to the water column during excavation operations and low long-term environmental risks from removal of the accumulation of cuttings pile material. However, the recovered historic cuttings are considered waste, and as such injection back into the formation would not be permissible under the OSPAR Convention and the London Protocol, which prohibits the disposal of industrial wastes in such a manner."



CNR International

- 2 -

Notwithstanding this, we agree that it would be helpful to have a more thorough knowledge of the pile contents. As our Comparative Assessment indicates (section 5.2.7) this would help validate the modelling used to predict the long term fate of the drill cuttings pile and potentially, as you suggest, help to inform future management options. We are currently investigating how and when this might be achieved, researching current and potential technologies which might enable deeper sampling.

I hope that this response goes some way to alleviate your concerns though recognise that on some fundamental points there is a divergence of opinion. We nevertheless thank you again for the considerable thought you have put into your response to the consultation and for taking part in pre-consultation discussions so fully.

Yours sincerely

Carol Barbone
Stakeholder & Compliance Lead

cc Richard Moxon, Defra
Kevin Munro, DECC Offshore Decommissioning Unit

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Carol Barbone
Stakeholder & Compliance Lead
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St Magnus House
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Scotland, UK

15th August 2013

Dear Carol,

Re: MURCHISON DRAFT DECOMMISSIONING PROGRAMMES

Many thanks for your letter dated 14th August, in which you respond to the points raised in our submission to the formal consultation process relating to the proposed decommissioning programmes for the Murchison facilities. As you note, there are some points of mutual agreement and others on which we still hold different views, but I greatly appreciate your commitment to the consultation process, including the time and efforts you have taken to respond in writing to the concerns we raised in our submission.

Regarding the issue of drill cuttings, and the obligations on operators required under the current OSPAR approach, we would very much welcome a more detailed discussion with DEFRA and DECC, as you have suggested. As we stressed in our submission, it has been our view since well before the agreement of OSPAR Recommendation 2006/5 that there should be a presumption to remove drill cuttings where it is technically feasible to do so and unless there are compelling reasons to justify a different option. We also feel strongly that the limited considerations which are legally required when identifying acceptable management options under the current regime do not take into account important additional information on the chemical characteristics of the cuttings pile, including the presence (as in this case) of substantial concentrations and overall estimated quantities of hazardous substances long identified as priorities for action by OSPAR (PAHs, alkylphenol compounds, organotin compounds, lead, cadmium and mercury). There is a real concern that, in not ensuring that such information is taken properly into consideration before making decisions

regarding drill cuttings, Contracting Parties are failing to give full effect to commitments under other strategies of the OSPAR Convention.

We can understand the intent of comparative assessments of management options for drill cuttings piles but would argue that, rather than considering all legal options to have equivalent initial preference and relying on a comparative assessment to identify a clear winner, a more responsible alternative would be to consider removal to shore as the initial option of preference and then to use comparative assessment to determine if there are any compelling reasons (health & safety or environment) why this preference should not be implemented in any one case. Such an approach would combine risk-based and responsibility/reputational-based management and would, in our view, lead to more defensible decisions regarding drill cuttings piles.

We would be very happy to participate in a meeting with relevant officers from DEFRA and DECC to discuss these issues in more depth, as and when such a meeting can be arranged.

Yours sincerely,

A handwritten signature in cursive script that reads "David Santillo".

Dr David Santillo
Senior Scientist
Greenpeace Research Laboratories

CC: Richard Moxon, DEFRA
Kevin Munro, DECC Offshore Decommissioning Unit

Carol Barbone

From: Carol Barbone
Sent: 24 July 2013 16:30
To: 'Chris Charman'
Subject: RE: CONSULTATION ON THE MURCHISON FIELD DRAFT DECOMMISSIONING PROGRAMME

Dear Chris

I am grateful to you for your email of 10 July with details of the IMCA position which you will be reassured to know was communicated to me in 2012. I nevertheless wanted to ensure that you had sight of our formal decommissioning programme consultation in case there was anything you wished to add to the extensive liaison we have undertaken with others within the industry, but am grateful for the reiteration of the IMCA Council's position.

I will continue to keep you briefed on developments and with relevant updates as things move forward.

Thank you again.

Kind regards

Carol

PS Please accept my apologies for the delay in responding to your email – I have been travelling on business for most of the past fortnight and have only now been able to respond to your email.

From: Chris Charman [mailto:Chris.Charman@imca-int.com]
Sent: 10 July 2013 09:23
To: Carol Barbone
Subject: RE: CONSULTATION ON THE MURCHISON FIELD DRAFT DECOMMISSIONING PROGRAMME

Many thanks for this Carol - please call me Chris!

This issue was identified in March 2012 during the tenure of the previous CEO, and it seems appropriate to share with you that which was determined by our Council;

'IMCA's position as a stakeholder was relevant for oil companies to keep IMCA advised on progress of decommissioning. However Council felt that IMCA was not the conduit between the oil company and contractors regarding feasibility, planning for and carrying out such work. Such communication did not belong in a stakeholder information exchange. Rather the oil company should liaise with relevant parties in the industry (contractors/consultants) on those issues directly. It was agreed IMCA secretariat should not be involved in such meetings.'

I'm sorry if this is not was passed on to you at the time, but please keep us involved in issues as they arise in order that I can keep the members fully informed.

Kind regards, Chris

Chris Charman
Chief Executive

IMCA - International Marine Contractors Association

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Chris.Charman@imca-int.com

Carol Barbone

From: Melissa Moore <Melissa.Moore@mcsuk.org>
Sent: 07 August 2013 22:05
To: Carol Barbone
Cc: Calum Duncan
Subject: Please look at the following

Dear Carol

Thanks for extended deadline. MCS response below.

1. All platform and subsea wells will be plugged and abandoned in accordance with Oil & Gas UK Guidelines.
MCS assume Oil & Gas Guidelines are in line with OSPAR guidelines
2. The platform topside modules will be removed and returned to shore for reuse, recycling or disposal.
MCS support this proposal
3. It is recommended that the jacket be removed down to the top of footings (at 44m above the seabed) and returned to shore for reuse, recycling or disposal. The jacket footings would then be left in place.
MCS support the jacket being removed. We are disappointed that the jacket footings will be left in place but accept this proposal providing it does not prevent access to the drill cuttings
4. The drill cuttings pile located within the jacket footings will be left *in situ* to degrade naturally with time, which is permissible under the rules contained within OSPAR Recommendation 2006/5.
MCS oppose the proposal for the drill cuttings to be left in situ. MCS believe that efforts should be made to recover drill cuttings as far as is feasibly possible.
5. The short early production pipeline bundles and associated subsea equipment will be removed and returned to shore for recycling or disposal.
MCS support this proposal
6. The main oil export line (PL115) will be left *in situ* with remedial rock placement over exposed sections. The main pipeline tie in spools, at either end, will be removed and returned to shore for recycling or disposal.
MCS opposes the proposal to leave the main oil export line in situ. We believe such debris, especially oil contaminated debris should be removed.
7. The Murchison PL165 gas import riser will be decommissioned and isolated at the subsea riser tie-in spool as part of the Murchison Field decommissioning programme. This will be in preparation for the future decommissioning of PL165 by the NLGP System Owners.
8. On completion of the decommissioning programmes a seabed survey will be undertaken to identify oilfield related debris within the platform's 500m zone and a 200m wide corridor along each pipeline. All items of oilfield debris will be categorised and in consultation with DECC a management and recovery plan will be agreed. Following completion of the recovery plan, verification of seabed clearance by an independent organisation will be carried out.
MCS supports development and subsequent implementation of a recovery plan and would like to be consulted on this

Best wishes

Melissa

Melissa Moore
Senior Policy Officer
Marine Conservation Society

Mobile: 07793 118386

Home office: 01823 401290
Head office: 01989 566017
Email: melissa.moore@mcsuk.org



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CNR International

Ms Melissa Moore
Senior Policy Officer
Marine Conservation Society
By email

21 August 2013

Dear Melissa

RE: MURCHISON DRAFT DECOMMISSIONING PROGRAMMES

I am writing to thank you for responding to the consultation on the draft Murchison Decommissioning Programmes and to respond formally to your points, using the same numbering as your own for ease of reference.

1. The Oil & Gas Guidelines for well plugging and abandonment are the accepted standard – OSPAR does not have such guidelines.
2. We acknowledge your support for removal of the topsides.
3. The drill cuttings pile is largely within the footprint of the jacket footings. Removing the jacket down to the top of the footings will not change access to the cuttings pile at a later date from the sides, but would make access from the top easier.
4. Full assessment has been made of the range of options for addressing the drill cuttings and consideration also made of OSPAR's recommendation 2006/5 which indicates that if the oil release rate from a cuttings pile is less than 10 te/yr and the area persistence is less than 500 km²years then the best environmental option for the management of the pile is to leave it in place undisturbed to degrade naturally.
5. We acknowledge your support for the removal of the bundles and associated subseq equipment.
6. We note your opposition to leaving the exposed sections of pipeline PL115 in situ. By way of reply I would reiterate that the extensive work which has been undertaken to identify the optimum solution for other users of the sea has clearly shown the safety reasons which underpin this recommendation. I should stress that the oil export pipeline would be fully cleaned prior to the application of rock cover to ensure that there would be no hydrocarbon contamination of the marine environment.
7. It is CNRI's intention to remove all seabed debris that presents a risk and a full survey of items on the seabed was undertaken in 2011 in preparation for this. This will be undertaken at some point between 2018 and 2021 depending on the final project schedules. We see no reason why we would not share results of the post decommissioning survey with the Marine Conservation Society and indeed would be pleased to have your view on the scope for subsequent surveys and monitoring for discussion with DECC. This will be noted in our Action Tracker to ensure that appropriate approaches are made to the Society at the right time.

Continued/...

I appreciate that a short reply of this nature may not fully address your concerns and would repeat our offer to meet with you and Calum to talk further on this, particularly since a heavy workload has meant that you have been unable to take up our previous offers to share information and plans on the Murchison decommissioning with the Society. If it is any help, I will be in Edinburgh colleagues on Wednesday 11 September and we would be happy to meet if this timing worked for you. Alternatively, we could set up a visit on a different occasion if that would be more convenient.

Yours sincerely

Carol

Carol Barbone
Stakeholder & Compliance Lead

cc Calum Duncan, MCS UK

Northern Lighthouse Board

Your Ref: Email 280613/Murchison Decomm
Our Ref: AJ/OPS/ML/OFFOIL_064_13

Ms Carol Barbone
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04 July 2013

Dear Carol

CONSULTATION ON THE MURCHISON FIELD DRAFT DECOMMISSIONING PROGRAMME

Thank you for your correspondence dated 28 June 2013 regarding consultation on the Draft Decommissioning Programme for the Murchison Field located within UKCS Block 211/19, in the Northern North Sea.

With regard to the scope of the Decommissioning Programme and the Stakeholder Consultation, we would only comment on any part relating to Shipping and Navigational Safety contained within the report and any supporting documentation.

We would advise that having studied the documentation and the Comparative Assessment Method the Northern Lighthouse Board have no objection to the preferred option of complete removal of the structure to a level approximately 112 metres below Lowest Astronomical Tide, with the remaining footings being properly identified on Admiralty Chart BA295 and recorded within the FishSafe information system. We would require that Notice(s) to Mariners, Radio Navigation Warning(s) and publication in appropriate bulletins will be required stating the nature and timescale of any works carried out in the marine environment relating to the decommissioning project. On final completion of the decommissioning operations we would require the position of any remaining sub-sea structure(s) and pipelines are communicated to the UKHO in order that the admiralty chart BA295 can be correctly updated as stated above.

Marking and Lighting will be recommended for each stage of the decommissioning process through the formal DECC application and licensing process. We recognise that it may be necessary to suspend decommissioning operations due to seasonal weather and the meteorological conditions commonly experienced in the Northern North Sea and would therefore require that we are informed prior to any suspension of operations in order that we can propose a suitable Marking and Lighting regime to inform the mariner of any remaining obstructions for the duration of these periods. All vessel(s) deployed for the purposes of carrying out the decommissioning and/or removal of the infrastructure shall be marked and lit as per the International Regulations for the Prevention of Collisions at Sea.

We would also require that notifications of any movements are sent to this office regarding the mobilisation and de-mobilisation of specialist vessels with respect to these operations. These can be sent via e-mail to navigation@nlb.org.uk or via fax to 0131-220-0235 marked for the attention of the Navigation Department.

Please advise if we can be of any further assistance or if any of the above requires clarification.

Yours sincerely

Peter Douglas
Navigation Manager

For the safety of

Certified to: ISO 9001:2000 · The International Safety Management Code (ISM) · OHSAS



CNR International

Mr Peter Douglas
Navigation Manager
Northern Lighthouse Board
84 George Street
Edinburgh EH2 3DA

14 August 2013

Dear Peter

RE: MURCHISON DRAFT DECOMMISSIONING PROGRAMMES

Further to my earlier email acknowledging receipt of your response to the draft Murchison Decommissioning Programmes, I am writing now to respond formally to your points, made within the scope of our proposals relating to Shipping and Navigational Safety.

We appreciate confirmation that you have no objection to the removal of the jacket to a level approximately 112 metres below Lowest Astronomical Tide, with the remaining footings being properly identified on Admiralty Charts and recorded within the FishSafe information system. We have updated our draft Decommissioning Programme to make specific reference to Admiralty Chart BA295, and to capture the requirement for Notice(s) to Mariners, Radio Navigation Warning(s) and publication in appropriate bulletins of details of the nature and timescale of any works carried out in the marine environment relating to the decommissioning project.

We also note in our updated programme that on final completion of the decommissioning operations the NLB requires the position of any remaining sub-sea structure(s) and pipelines to be communicated to the UKHO in order that the Admiralty Chart BA295 can be correctly updated.

Furthermore, we fully agree the need for appropriate marking and lighting at each stage of the decommissioning process through the formal DECC application and licensing process. My colleagues have already begun discussions with your office on expectations in this regard, and I would expect that close links will be maintained to ensure that optimal safety is ensured during the different stages as appropriate.

We can confirm that our Invitation to Tender documents make clear that all vessel(s) deployed for the purposes of carrying out the decommissioning and/or removal of the infrastructure shall be marked and lit as per the International Regulations for the Prevention of Collisions at Sea. This will be verified by our Marine Warranty Surveyor.

Finally, we are making specific note in our Permits, Licences and Consents ('PLANC') Register your requirement that notifications of any movements regarding the mobilisation and de-mobilisation of specialist vessels with respect to the operations will be sent by email (to navigation@nlb.org.uk) or by fax (0131 220 0235 for the attention of the Navigation Department at the NLB offices).

Thank you once again for your offer of further assistance should this be required. I have no doubt that we will be liaising with you regularly and look forward to working with you.

Yours sincerely

Carol Barbone
Stakeholder & Compliance Lead

Carol Barbone

From: Lorna.Duguid@aberdeenshire.gov.uk on behalf of NSRAC@aberdeenshire.gov.uk
Sent: 03 July 2013 17:20
To: Carol Barbone
Subject: Re: FW: CONSULTATION ON THE MURCHISON FIELD DRAFT DECOMMISSIONING PROGRAMME

Dear Carol,

Martin is no longer working with NSRAC and I have taken over his responsibilities. On this occasion NSRAC will not be submitting a formal response. As a stakeholder membership organisation it is difficult to gain consensus from all of our members regarding these subjects and this is not in our listed objectives for this year. It is likely that NSRAC members who have an interest in this will respond directly with their own views and opinions.

Kind Regards,

Lorna Duguid
NSRAC Executive Secretary

-----Carol Barbone <Carol.Barbone@cnrinternational.com> wrote: -----

To: "nsrac@aberdeenshire.gov.uk" <nsrac@aberdeenshire.gov.uk>
From: Carol Barbone <Carol.Barbone@cnrinternational.com>
Date: 06/28/2013 07:49PM
Subject: FW: CONSULTATION ON THE MURCHISON FIELD DRAFT DECOMMISSIONING PROGRAMME

Dear Martin

Further to my email on 31 May advising of the launch of the Murchison Draft Decommissioning Programme, I just wanted to check whether you had any queries or would like to see any of the reference documentation in support of the proposals.

The consultation is due to close in two weeks, at the end of Friday 12 July, and I very much hope that you will be able to comment formally. This may be on aspects of the plans relevant to your own areas of interest, on the Murchison plans as a whole, on the approach we have taken during the pre-planning in order to fully capture the views and knowledge of stakeholders – or on a mix of these. It is important that we capture your views (and respond appropriately) not only in connection with the way forward on Murchison, but also as part of the learning journey for the oil and gas industry as a whole on decommissioning.

I very much look forward to hearing from you and am at the ready to provide further information as may be required.

Kind regards

Carol



nature's voice

RSPB SCOTLAND

Ms Carol Barbone
CNR International (UK) Limited
St Magnus House
Guild Street
Aberdeen AB11 6NJ

13 June 2013.

Dear Carol

CONSULTATION ON THE MURCHISON FIELD DRAFT DECOMMISSIONING PROGRAMME

Thank you for consulting RSPB Scotland on your proposals. We greatly appreciate the level and nature of public engagement which has led to the submission of proposals for decommissioning the Murchison platform and pipelines, which we consider acceptable. Our starting point for consideration of site clearance is that restoration should be to the state existing before development commenced. However, we recognise that such an aspiration may be more hazardous to the environment and to human safety than what is actually proposed and that Murchison qualifies as a derogation candidate under OSPAR Decision 98/3, exempting the need for the full removal of all platform facilities.

I ask that RSPB be kept informed of the progress of this project and particularly if any significant changes should arise as a result of this formal consultation.

Yours sincerely,

Peter Gordon

Conservation Planning Officer

North Scotland
Regional Office
Etive House
Beechwood Park
Inverness IV2 3BW

Tel 01463 715000
Fax 01463 715315

www.rspb.org.uk/scotland





CNR International

Peter Gordon Esq
Conservation Planning Officer
RSPB Scotland
North Scotland Regional Office
Etive House
Beechwood Park
Inverness IV2 3BW

17 June 2013

Dear Pete

CONSULTATION ON THE MURCHISON FIELD DRAFT DECOMMISSIONING PROGRAMME

Thank you for your letter of 13 June containing RSPB Scotland's response to the consultation on the Draft Decommissioning Programme for the Murchison Field.

We are grateful for your comments which express not only our own starting point for the comparative assessment of options in terms of a return to the state existing before development commenced but which also recognises the challenges faced in striking a balance for the decommissioning process.

We are also cognisant of the efforts which you and your colleagues from RSPB Scotland have made and continue to make as part of the engagement process with CNRI. We have found your contributions to the decommissioning discussion during the preparatory phase to have been well-informed and conscientious and they have enriched our own consideration of the options for going forward.

I will keep you informed of the progress of the project as you request and particularly on any significant changes should these arise as a result of the formal consultation.

Yours sincerely

Carol Barbone
Stakeholder and Compliance Lead (Decommissioning)
carol.barbone@cnrinternational.com Tel: 00 44 (0) 1224 303102

Esso Norge AS
Grenseveien 6, N-4313 Sandnes
P. O. Box 60, N-4064 Stavanger, Norway
47 51 60 62 92 Telephone
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Jan Åge Hansen
Norway Joint Interest Manager

ExxonMobil
Production

S-35695

CNR International (U.K.) Limited
St. Magnus House
Guild Street
Aberdeen
Scotland
AB11 6NJ United Kingdom

Attn. Miss Carol Barbone

Forus, 12 July 2013

Dear Miss Carbone

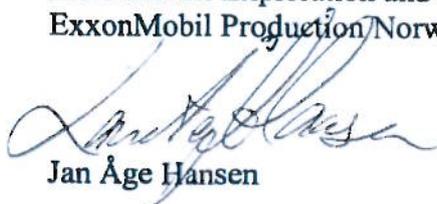
MURCHISON DRAFT DECOMMISSIONING PROGRAMME

Reference is made to your letters dated May 28, 2013 to ExxonMobil Production Norway Inc. (hereinafter referred to as "EPNI") and ExxonMobil Exploration and Production Norway AS (hereinafter referred to as "EEPN") and the Draft Decommissioning Program for the Murchison Field attached thereto.

Based on our interpretations of the Petroleum Act 1988, section 29, and Agreement between the Government of the Kingdom of Norway and the Government of the United Kingdom of Great Britain and Northern Ireland relating to the Exploitation of the Murchison Field Reservoir EPNI and EEPN has no responsibilities.

Therefore, EPNI and EEPN abstains from commenting on the Murchison Field Decommissioning Programme. Please amend the Murchison Field Decommissioning Programme so that it is made clear that it is not submitted on behalf of EPNI and EEPN.

Regards
Esso Norge AS
for and on behalf of
ExxonMobil Exploration and Production Norway AS and
ExxonMobil Production Norway Inc.



Jan Åge Hansen

An ExxonMobil Subsidiary
NO 914 803 802 VAT



CNR International

Mr Jan Åge Hansen
Norway Joint Interest Manager
Esso Norge AS
N-4064 Stavanger
Norway

14 August 2013

Dear Mr Hansen

RE: MURCHISON DRAFT DECOMMISSIONING PROGRAMMES

Thank you for your letter of 12 July requesting that we amend the draft Murchison Field Decommissioning Programmes to make clear that it is not submitted to the UK Department of Energy and Climate Change (DECC) on behalf of ExxonMobile Exploration and Production Norway AS and ExxonMobil Production Norway Inc.

Given your status as previous licensees/owners who are nevertheless currently holders of a section 29 notice issued under the Petroleum Act 1998, we are obliged to ensure that you are aware of the Decommissioning Programmes and to make the submission of the programmes to DECC in that context, even though you no longer have an equity holding.

We have taken advice from DECC as the responsible authority for issuing section 29 notices and they have suggested that if you wish to discuss your section 29 noticeholder status further, you should make contact with Kevin Munro in DECC's Offshore Decommissioning Unit at kevin.munro@decc.gsi.gov.uk.

Kind regards

Carol Barbone
Stakeholder & Compliance Lead

cc Kevin Munro, DECC
Audun Våge, Esso Norge AS



Carol Barbone

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Foretaksnummer NO 914 807 077 MVA

13 September 2013

MURCHISON DRAFT DECOMMISSIONING PROGRAMME

STATUTORY CONSULTATIONS – SECTION 29 HOLDERS

Enterprise Oil Norge AS, Company Number 929 956 917

A/S Norske Shell, Company Number 914 807 077

Dear Ms. Barbone,

Reference is made to your letter dated 28 May 2013.

Please be advised that based on our interpretations of the Petroleum Act, section 29, and Agreement between the Government of the Kingdom of Norway and the Government of the United Kingdom of Great Britain and Northern Ireland relating to the Exploitation of the Murchison Field Reservoir (1979), A/S Norske Shell and wholly owned subsidiary Enterprise Oil Norge AS as former Norwegian licensee have no responsibilities as regards decommissioning of Murchison field.

Therefore, A/S Norske Shell and Enterprise Oil Norge AS abstain from commenting on the Murchison Field Decommissioning Programme. Please amend the Decommissioning Programme so that it is made clear that it is not submitted on behalf of A/S Norske Shell and Enterprise Oil Norge AS.

Yours sincerely,

Clare J. McIntyre

Commercial Advisor

A/S Norske Shell

Enterprise Oil Norge A/S



CNR International

Ms Clare J McIntyre
Commercial Advisor
A/S Norske Shell; Enterprise Oil Norge A/S
Hovedkontor (Head Office)
Tankvegen 1
Postboks 40
N-4098 Tananger
Norway

19 September 2013

Dear Ms McIntyre

RE: MURCHISON DRAFT DECOMMISSIONING PROGRAMMES

Thank you for your letter of 13 September requesting that we amend the draft Murchison Field Decommissioning Programmes to make clear that it is not submitted to the UK Department of Energy and Climate Change (DECC) on behalf of A/S Norske Shell and its wholly owned subsidiary Enterprise Oil Norge AS.

Given your status as previous licensees/owners who are nevertheless currently holders of a section 29 notice issued under the Petroleum Act 1998, we are obliged to ensure that you are aware of the Decommissioning Programmes and to make the submission of the programmes to DECC in that context, even though you no longer have an equity holding.

We have taken advice from DECC as the responsible authority for issuing section 29 notices and they have suggested that if you wish to discuss your section 29 noticeholder status further, you should make contact with Kevin Munro in DECC's Offshore Decommissioning Unit at kevin.munro@decc.gsi.gov.uk.

Kind regards

Carol Barbone
Stakeholder & Compliance Lead

cc Kevin Munro, DECC

From: Nikolai Lyngø [mailto:nily@statoil.com]
Sent: 12 July 2013 08:19
To: Carol Barbone
Cc: Jeremy Lever; Inger Anette Frafjord; Tony Saul; Alison Barrie
Subject: Murchison Draft decommissioning programme Statutory consultation

Dear Carol,

Reference is made to your letter dated 28 May 2013, Murchison Draft decommissioning programme Statutory consultation – section 9 notice holders Statoil ASA, company number 923 609 016.

Based on our interpretations of the Petroleum Act, section 29, and the Agreement between the Government of the Kingdom of Norway and the Government of the United Kingdom of Great Britain and Northern Ireland relating to the Exploitation of the Murchison Field Reservoir the Statoil group has no responsibilities.

Therefore the Statoil group abstains from commenting on the Murchison Field Decommissioning Programme. Please amend the Decommissioning Programme so that it is made clear that it is not submitted on behalf of the Statoil group.

Best regards,

Nikolai Lyngø
Vice President Business Development
DPN SBD POR
Statoil ASA

Telephone: +47 90849100
Email: nily@statoil.com

Visitor address: Forusbeen 50, Norway
Incorporation number: NO 923 609 016 MVA

www.statoil.com

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Thank you



CNR International

Mr Nikolai Lyngø
Vice President Business Development
DPN SBD POR
Statoil ASA
NO-4035 Stavanger
Norway

14 August 2013

Dear Nikolai

RE: MURCHISON DRAFT DECOMMISSIONING PROGRAMMES

Thank you for your email of 12 July requesting that we amend the draft Murchison Field Decommissioning Programmes to make clear that it is not submitted to the UK Department of Energy and Climate Change (DECC) on behalf of Statoil ASA.

Given your status as previous licensees/owners who are nevertheless currently holders of a section 29 notice issued under the Petroleum Act 1998, we are obliged to ensure that you are aware of the Decommissioning Programmes and to make the submission of the programmes to DECC in that context, even though you no longer have an equity holding.

We have taken advice from DECC as the responsible authority for issuing section 29 notices and they have suggested that if you wish to discuss your section 29 noticeholder status further, you should make contact with Kevin Munro in DECC's Offshore Decommissioning Unit at kevin.munro@decc.gsi.gov.uk.

Kind regards

Carol Barbone
Stakeholder & Compliance Lead

cc Kevin Munro, DECC

Carol Barbone

From: Ian Pollard <Ian.Pollard@fairfield-energy.com>
Sent: 11 July 2013 11:15
To: Carol Barbone
Cc: John Wiseman
Subject: RE: CONSULTATION ON THE MURCHISON FIELD DRAFT DECOMMISSIONING PROGRAMME

Carol,

Fairfield has the following comments to make on the current Murchison Field Draft Decommissioning Programme and associated key documents:-

Draft Decommissioning Programme document

Page 13 of 13, Table 1.6: Adjacent Facilities :- We consider that 'Operator' may be a more appropriate term to use as the heading to column 1 of the table (rather than 'owner'), and this would be consistent with your use of the term 'operator' throughout the narrative text of the various documents.

Page 17 of 53, Figure 2.2: PL115 Schematic :- We consider that annotations numbered 1 and 2 on the schematic (referring variously to 'Owned by Murchison Field Group', the 'Unitisation and Unit operating Agreement' (sic) and to 'Dunlin Murchison Thistle Pipeline Agreement') are not necessary and potentially confusing. Also we consider that the text at the bottom of the schematic entitled 'PL-115 Limits' (sic) and which differentiate 'Owner', 'Operator', 'Operations', 'Primary Emergency Response' and 'Integrity' to be unnecessary in the context of the decommissioning programme. We suggest that the schematic would be clearer if the annotations 1 and 2 were removed completely from the schematic, and that the descriptions of 'PL-115 Limits' are simplified by removing the limit lines that describe 'Operations', 'Primary Emergency Response' and 'Integrity'.

We have also noted the following minor typos that you may wish to correct:-

Page 45 of 53, Column 4 of the table entry for Greenpeace: "Meetings to review of material"

Page 47 of 53, final paragraph : "...and for notification and marketing on Admiralty Charts"

Comparative Assessment Report document

Page 38, Figure 22: PL115 Schematic :- We have the same comments and suggestions on this schematic as stated above.

Please do not hesitate to contact me if you need additional clarification.

Regards

Ian Pollard
Corporate HS&E Manager

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CNR International

Mr Ian Pollard
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Staines-upon-Thames TW18 4RH

14 August 2013

Dear Ian

RE: MURCHISON DRAFT DECOMMISSIONING PROGRAMMES

Further to my earlier email acknowledging receipt of your response to the draft Murchison Decommissioning Programmes, I am writing now to respond formally to your points.

With regard to the presentation of Table 1.6 of the draft programme, we have followed the Standard Decommissioning Programme template required by DECC. This template was issued by them to all operators for comment before it was confirmed and published and it would therefore be inappropriate for CNRI to make changes to it at this stage.

With regard to Figure 2.2 of the draft programme (also contained in the Comparative Assessment Report as Figure 22) showing the PL115 Schematic, this was added at the request of DECC and reflects the information they have specified.

We are grateful to you for highlighting the typographical errors on pages 45 and 47 and are correcting these before finalising the Decommissioning Programmes.

Yours sincerely

Carol Barbone
Stakeholder & Compliance Lead

cc Dominic Farrell, CNRI
Rob Sinclair, CNRI