## BRENT E-NEWS

Brent Decommissioning Project

Welcome to the sixth in the series of regular communications from the Brent Decommissioning Project Team

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## Paving the way for the Brent Decommissioning Programme

This year, the Brent Decommissioning Project has entered a key stage in the journey which our current planning indicates, will conclude next year with the planned submission of our proposed Decommissioning Programme (**DP**) to the Department of Energy and Climate Change (**DECC**).

The Environmental Scoping Report for the Brent Decommissioning Environmental Impact Assessment (EIA) has been issued to our stakeholder community - a diverse group of more than 150 organisations - as part of the project's ongoing stakeholder dialogue process.

Once again, we have to say that this is not 'business as usual', given the enormous scale of the EIA, which will cover the full scope of the Brent field platforms and pipelines.

For me, the key elements of this important stage are that the scoping report has been conducted by a reputable international company with an independent perspective, whose work has 'closed the circle' by bringing together all relevant technical and environmental considerations within a single document.

We welcome any thoughts you may have on any aspect of the EIA process.

### **AUSTIN HAND**

**Project Director** 



We welcome any thoughts you may have on any aspect of the EIA process





### **CONTACT**US

For further information on the Project, please visit www.shell.co.uk/brentdecomm or get in touch with the team via the 'Contact Us' link on the website.

# **Developing**... the Brent Decommissioning Programme



The precise content of a decommissioning programme may vary according to the circumstances, but the basic format is as follows:

- 1. Introduction
- 2. Executive Summary
- 3. Background information
- 4. Description of items to be decommissioned
- 5. Inventory of materials
- 6. Removal and disposal options
- 7. Selected removal and disposal option
- 8. Wells
- 9. Drill cuttings
- 10. Environmental Impact Assessment
- 11. Interested party consultations
- 12. Costs
- 13. Schedule
- 14. Project management and verification
- 15. Debris clearance
- **16.** Pre- and post-decommissioning monitoring and maintenance
- 17. Supporting studies

A Decommissioning Programme (DP) is a formal document, produced by an operator for submission to DECC, which outlines the proposed methodology and timescale for decommissioning. The document is supported by an EIA and other documents providing full details of technical studies and comparative assessments instrumental in determining the recommended options for decommissioning.

The decommissioning of offshore oil and gas installations and pipelines is regulated by DECC under legislation governed by the Petroleum Act 1998, Section 29. This regulation is premised on the OSPAR 98/3 Decision on the Disposal of Disused Offshore Installations (Link to OSPAR website) (see Derogation Process to the left).

The consideration and approval of decommissioning programmes for installations and pipelines is coordinated by DECC's Offshore Decommissioning Unit, in Aberdeen. The Unit will also consult with other Government departments, devolved administrations and agencies that have an interest in the consideration of decommissioning proposals.

Submitting the Programme
Specialist Team

Brent Decommissioning Project HSSE Manager Gwyn Roberts and his team of safety and environmental experts are responsible for the production of the Brent field DP and associated documentation, including the scoping report and EIA.

"In developing the Brent DP, Shell is working in close alignment with DECC's Guidance notes for the decommissioning of offshore oil and gas installations and pipelines (https://www.og.decc.gov.uk/regulato n/guidance/decommission.htm), "Gwyn explains.

"This will ensure that our DP document fully meets the expectations and requirements of DECC and all our stakeholders".

The team's Environmental Advisor, Gordon Picken, adds: "The ongoing stakeholder dialogue process, which began in 2006, also plays a highly significant part in ensuring that all issues and options have been fully explored during the DP preparation and consultation phases.

"Nevertheless, given the fact that it necessarily involves a number of Government departments and a wide range of international stakeholders, the DP approval process will be comprehensive and will comprise a number of iterative stages, expected to take 15-18 months to complete."

In its final form, the DP will be submitted formally to DECC in Q3 2013, for approval by the Secretary of State for Energy and Climate Change. This approval must be granted before any decommissioning work can begin in the Brent field.

## DP to Secretary of State for Approval **Q3**, 2013 **Draft 4:** DP submitted to DECC **Q2**, 2013 DECC formally requests submission of DP **Q1**, 2013 **Derogation Document** submitted to DECC DECC review and consultation with OSPAR Q4, 2012 **Draft 3:** DP submitted to DECC Statutory and public consultations Q3, 2012 **Draft 2:** Consultation Draft DP submitted to DECC Informal review by DECC Q2, 2012 **Draft 1:** Informal submission of DP to DECC Management review (Shell/XoM) Q1, 2012 Decommissioning Programme (DP) prepared Comparative Assessments Environmental Impact Assessment March 2011 \*Timings are approximate and for planning purposes only

**Decommissioning Execution** 

## Derogation Process An additional requirement



OSPAR is the mechanism by which 15 governments of the western coasts and catchments of Europe, together with the European Community, cooperate to protect the marine environment of the North-East Atlantic. The OSPAR 98/3 Decision on the Disposal of Disused Offshore Installations is premised on full removal of offshore facilities, but recognises that some structures can be candidates for derogation (i.e. may be left in place under certain controlled conditions) and also defines what constitutes a candidate for derogation.

Those readers involved in the ongoing stakeholder consultation process will be aware that the Brent Decommissioning Project has already identified the three (**Bravo**, **Charlie**, **Delta**) gravity based

structures (GBS) and the Alpha steel jacket as candidates for derogation. The project will therefore be required to produce a derogation document for submission to both DECC and OSPAR (DECC holds responsibility for presenting candidates for derogation to the OSPAR member countries). The derogation programme will discuss the proposed candidates for derogation, the range of options examined for both removing them and leaving them in place, the means by which the final derogation options were selected, and the proposed programme of work involved.

# **EIA Scoping report**Identifying areas for future examination



A key stage of the DP process is the production of the recently issued Environmental Impact Assessment (EIA) scoping report. Issuing the scoping report to interested stakeholders is considered as industry best practice with the objective of obtaining external feedback on the potential environmental, social and health impacts that are identified in the EIA scoping report, which require further additional examination in the full EIA.

#### THE SCOPING REPORT:

- Provides general descriptions of the Brent Field structures
- Describes the environmental baseline of the study area, highlighting the key environmental sensitivities, characterising the drill cuttings and describing current knowledge regarding the cell contents of the Brent Bravo, Charlie and Delta platform GBS
- Outlines the various decommissioning options being considered
- Describes the approach and systematic scoping methodology applied to identify the potentially significant issues
- Discusses the broad approach as to how the EIA will be conducted and highlights further studies that may be required for the EIA.

The scoping report has been produced by independent consultancy Det Norske Veritas (DNV), selected by Shell for its considerable experience as a global provider of services for managing risk, its sound reputation as an independent foundation with the objective of safeguarding life, property and the environment, and its track record in producing EIAs for concrete structures.

The current stakeholder consultation phase, which focuses on the scoping report, enables all parties interested in Brent decommissioning to review the project's proposed decommissioning options and the aforementioned potential significant issues associated with them.

Stakeholders are invited to feed back to Shell their comments, concerns and any additional issues that they believe require to be taken into consideration. This process of consultation is designed to ensure that the scope of the EIA is robust and addresses the full spectrum of environmental, social and health factors that will need to be taken into account by the Brent decommissioning programme.

#### THE EIA

"There is no doubt that the Brent Decommissioning EIA is a key element in the decommissioning programme process and the first draft of this very substantial document will be issued for review by stakeholders at the same time as the "Consultation Draft" DP document, planned in Q3 2012" confirms Gordon Picken.

The EIA will build on the ground prepared by the scoping report and subsequent Government and stakeholder feedback, providing a full and detailed assessment of the potential environmental impact of the DP.

Gwyn Roberts concludes with an important word about safety: "The EIA and DP are required to focus on the technical, environmental, social and health impacts of Brent decommissioning. Safety assurance will be the specific focus of separate documentation which the project will submit to the Health & Safety Executive (HSE), as part of the overall legislative process. However, as far as Shell, our partners and contractors are concerned, safety is – and always should be – inherent in our working culture, and it is therefore a given that the safety of our workforce is paramount in every aspect and small detail of the Brent decommissioning programme."