# CNR International

# 2024-Ninian-Southern-Stakeholder-Engagement-FAQs

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#### **GENERAL**

#### 1. Is there an overview of the Ninian Southern decommissioning project?

YES, a two-page overview is available online. A Fast Facts Summary has also been produced, describing principal characteristics of the platform. Many useful graphics can be accessed in the slides from the stakeholder workshop held in July 2024. A Jargon Buster guide with useful explanations and links is also available. These and other documents can be accessed on the <a href="Stakeholder Workshop">Stakeholder Workshop</a> web page for the project.

#### 2. What is the timeline for decommissioning?

Two draft Decommissioning Programmes for Ninian Southern will be presented for regulatory consideration and associated statutory and public consultation: the first, covering the topsides and upper jacket, is expected to be submitted for statutory and public consultation in late 2024. The Programme covering the lower section of the jacket and the footings is due for submission and consultation in mid-2025. Subsea Decommissioning Programmes for the wider Ninian field covering pipelines and structures such as manifolds, together with seabed debris clearance, and for the Ninian Central platform, will be presented separately at a later stage.

Production from Ninian Southern is expected to end in 2025. Plugging and abandonment of the platform wells is already underway as well as Engineering Down and Clean (to prepare the platform for decommissioning). There is a three-year window for platform removal operations, from 2027 to 2029.

#### 3. When did platform operations begin on Ninian Southern and who has owned the facilities during that time?

The Ninian Southern platform is located in the UK sector of the North Sea, 120 km east of the Shetland Islands and 457 km north-north-east of Aberdeen, in UKCS Block 3/8a, 25 km from the UK/Norwegian median line. The platform was installed in 1977 as part of the Ninian field development comprising Ninian Central, tied back facilities, and the now-decommissioned Ninian Northern platform. It was designed to operate as a combined drilling, production and process facility, exporting to Ninian Central and onwards to Sullom Voe Terminal in Shetland.

Production began in December 1978 with maximum production of over 120,000 barrels of oil per day reached in 1980, since then volumes have generally declined to a small proportion of peak output. Originally commissioned by Chevron, operatorship transferred to Oryx in 1997, then to Kerr McGee in 1999, before CNR International took over operatorship of Ninian Southern in 2002.

#### 4. What are the platform's principal characteristics?

Ninian Southern's topsides comprise fully integrated production, injection, drilling and accommodation facilities. Its 42 wells are linked to a process system that separates crude oil, gas and produced water. Production fluids from the Columba B, D & E and Lyell Fields are served by the facilities, while water injection supports the Ninian Reservoir, Lyell Field and, previously, the now-disused system for the Strathspey field. The topsides are supported by a four-legged welded steel jacket, installed in position with 32 grouted piles (eight piles for each leg), which stands in a water depth of 140 metres.

See the Fast Facts Summary for an illustrated guide and the Jargon Buster for an explanation of unfamiliar terms.

#### 5. What approach is being taken to the Decommissioning Programme preparation?

The aim is to decommission the platform in accordance with the regulatory guidance and relevant updates from the Offshore Petroleum Regulator for Environment and Decommissioning (OPRED), the Offshore Energies UK (OEUK) guidelines for well abandonment, and in compliance with CNR International's own internal policies and procedures. The starting point for the examination of potential options for removal takes a base case in which all structures will be removed to leave a clear seabed.

The current plan is for a two-phase approach, addressing plans for the topsides and upper part of the jacket (cut between 77 and 87 metres below sea level (Lowest Astronomical Tide)) in one Decommissioning Programme, and decommissioning of the lower jacket and footings in another. Separation of the two phases of the decommissioning is designed to enable earlier contracting of the removal of the topsides and upper jacket while work continues to explore the removal options for the footings and lower jacket. Removal of the topsides/upper jacket will not compromise the decommissioning options for the footings/lower jacket.

#### 6. How will safety factors be considered?

Safety is a core value in all that CNR International does, including decommissioning activities. In the Comparative Assessment (to be used for the lower jacket and footings), safety is one of the five key criteria against which decommissioning options are evaluated, covering safety of offshore crew and other users of the sea during and between decommissioning activities, and of any ongoing risks post decommissioning. For proposed decommissioning operations, CNR International's robust Safety Management System will be utilised to risk assess and place hazard prevention and mitigation barriers in place for all our activities.

#### 7. Are CNRI encouraging collaborative opportunities in association with the decommissioning?

YES. CNR International liaises regularly with industry peers and supports research initiatives such as the INSITE programme. Opportunities for collaboration around Ninian Southern and the Ninian field decommissioning more generally are currently being explored and academic researchers who aren't already liaising with CNR International are invited to get in touch for further discussion. In terms of formal opportunities to work with industry, CNR International is active within industry group Offshore Energies UK that has a number of decommissioning-related workgroups featuring other operators and the supply chain. The company also collaborates with Decom Mission (primarily focused on the supply chain) on a regular basis.

#### 8. How can the supply chain engage with the project?

The North Sea Transition Authority's <u>Energy Pathfinder</u> database is a useful source of information on forthcoming opportunities for this and other decommissioning projects. In addition, CNR International works with the Achilles 'Global Energy' database and will continue to liaise directly with the supply chain in the development of plans. Regular engagements are also carried out with the supply chain. Further questions should be directed to <u>decom.international@cnrl.com</u>.



#### **TECHNICAL FACTORS**

#### 9. What are the principal challenges to be overcome?

The following are the main challenges that CNRI will be working to address through the application of new technologies and methods:

- Size and height of jacket legs The size of the two jacket legs is larger in diameter than current cutting capabilities. In addition, the height (17 metres) of the drill cuttings around the north-western leg adds a further complication.
- Module Support Frame The frame maintains the integrity of the jacket structure and there is not much internal bracing, creating a
  challenge to lifting the jacket as it is removed.
- Lifting platform legs The large diameter legs are not designed to be lifted from external or internal pressure. A method to lift gripping the cut edge will need to be developed.

#### 10. Will CNR International be investigating new technologies for decommissioning?

YES. CNR International have and will continue to actively seek technology solutions to all stages of the decommissioning challenge and remain committed to innovation. Availability of different technologies and their potential suitability and readiness levels form part of the scoping and screening of decommissioning options.

#### 11. What are the potentially feasible options for jacket removal?

A range of options are currently the subject of scoping and screening activities which will help to determine the most feasible approaches to be explored in depth through the Comparative Assessment.

#### **SAFETY MATTERS**

#### 12. How will safety at sea be managed during the decommissioning phases for the topsides and jacket components?

The timeframe between the topsides and upper jacket decommissioning stages will require appropriate marking of the structure for other users of the sea. This may take the form of aids to navigation being installed on the structure at various locations or marking of the structure in other ways such as cardinal buoys. Discussions have already begun with the Northern Lighthouse Board whose advice, in conjunction with the Maritime and Coastguard Agency, will continue to be sought as plans develop, and to identify the optimum solutions. Admiralty Chart marking, Notices to Mariners, Kingfisher Bulletin updates and FishSafe inputs will be used to raise awareness of decommissioning activities both during decommissioning activity and between them.

#### 13. How would a "leave in place" solution for the footings be managed?

If a "leave in place" solution for the footings emerges from the Comparative Assessment of options, a separate process would be implemented with the Regulator. The footings will be managed in line with the current industry best practice, including a contribution to the UK Fisheries Offshore Oil and Gas Legacy Trust Fund Limited (FLTC) to improve access for fishing vessels to location data of obstacles on the seabed. Updates to Admiralty Charts and all other data repositories will also be submitted.

#### 14. Are CNR International consulting fisheries bodies about the plans?

YES. Quarterly meetings are held with the Scottish Fisheries Federation to discuss broader offshore company activity, and supplementary meetings have commenced with a focus on Ninian Southern decommissioning. These cover both safety and commercial impacts. CNR International is also represented on the Fisheries Legacy Trust Company technical committee and active in discussions within this group.

#### 15. How will CNR International handle any hazardous material on the platform?

CNR International understands the requirement for whole-of-life Duty of Care for assets and the attendant reporting on this. Reviews of lessons learnt from previous decommissioning projects have informed the waste management strategy for Ninian Southern and inform the implementation of best practice. Extensive mapping of the platform inventory has been undertaken and CNR International are currently proactively surveying the facilities to understand the nature of exactly what is present and in what quantities so that the waste inventory can be shared with removal services contractors and summarised in the two Decommissioning Programmes for Ninian Southern. The process builds upon knowledge and best practices from previously executed removals and deconstruction scopes at CNR International.



#### **ENVIRONMENTAL INTERESTS**

#### 16. What will the decommissioning environmental assessments cover?

Environment' and 'environmental' are terms used in the context of a platform's decommissioning to cover all the considerations in relation to the platform and the flora, fauna, air, seabed and water in and around it, and how these interact. These considerations include characterisation of the area in which the platform was placed, the current status (e.g. in relation to species which may have 'adopted' the structure as a home, and the presence of contaminants, if any); and the potential future position after the completion of decommissioning activities (e.g. in relation to the enduring physical and biological presence of the platform).

#### 17. How will environmental impacts of decommissioning be assessed and reported?

The environment-related work to date and that which is planned, consists largely of studies, surveys and assessments that follow rigorous academic and ecological processes.

The starting point of the work was the 2023-24 Environmental Baseline Survey, which, together with additional studies and relevant data informs the Environmental Impact Identification (ENVID). The ENVID helped enable understanding of the environmental impacts of decommissioning the topsides and upper jacket. The Environmental Appraisal of decommissioning the lower jacket and footings, determined the requirements of a full environmental impact assessment of the recommended option from the comparative assessment.

A Post-decommissioning Environmental Survey will be conducted following decommissioning in a timeframe agreed with OPRED to assess the recovery of the seabed around the platform.

#### 18. Are there any nearby marine protected areas or protected features close to Ninian Southern?

The nearest Special Area of Conservation (SAC) is Pobie Bank Reef SAC that lies 72 km to the west of the installation; decommissioning of the platform is not expected to affect its designated features. There are no designated Nature Conservation Marine Protection Areas (NCMPAs) in the vicinity: the closest are the Fetlar to Haroldswick NCMPA (121 km to the west), the North-east Faroe-Shetland Channel (153 km to the north-west) and the Faroe-Shetland sponge belt (172 km north-west), while Special Protection Areas are further still from the platform. No impacts are expected on these from the decommissioning.

Ninian Southern is located in International Council for the Exploration of the Sea (ICES) rectangle 50F1, in an area of spawning and nursery grounds for several commercially important species. ICES rectangle 50F1 is located within a high intensity spawning ground for cod (January to April), haddock (February to May), Norway pout and saithe (January to April), whiting (February to June) and sandeel (benthic spawning species) (November to February). In addition, rectangle 50F1 is a nursery ground for anglerfish, blue whiting, European hake, haddock, herring, ling, mackerel Norway pout, sandeel, spurdog and whiting (throughout the year).

Cetacean species that could potentially occur within the area include white-beaked dolphin, minke whale and harbour porpoise. Harbour porpoises are listed under Annex II of the EU Habitats Directive and all three species are listed as Scottish Priority Marine Features (PMFs). All cetacean species occurring in UK waters are afforded European Protected Species (EPS) status. Details of the sightings and abundance of these species within the vicinity of the platform can be summarised as follows: minke whale – low density (July); harbour porpoise – low-density (May, July to August); white beaked dolphin – low density (July).

The following species have been recorded within the area: northern fulmar, northern gannet, Arctic skua, great skua, black legged kittiwake, great black backed gull, lesser black backed gull, herring gull, glaucous gull, Arctic tern, common guillemot, razorbill, little auk and Atlantic puffin.

Seabird densities in the area range from 15-52 individuals per km2 over the winter months (November – March) and from 15-52 individuals per km2 over the breeding/summer months (April – October). The majority of species present are at very low (<1) to low (5 – 10) densities, however the northern fulmar exists at very high (5 - 39) densities between August to February.

Seabird sensitivity in Block 3/8 is low all year round. Ninian Southern is located approximately 121 km from the nearest UK coast and is therefore remote from sensitive seabird breeding areas on the coast.

Vessel and topsides-based surveys in 2023 and 2024 (to be repeated annually) did not identify any nesting birds on the platform.

#### 19. Are cold water corals such as Lophelia pertusa present on the platform jacket?

YES. Colonies of Lophelia pertusa have been recorded on Ninian Southern's jacket structure and, previously on the nearby Ninian Northern platform, during marine growth surveys. While these corals are protected species, regulatory bodies have confirmed that where present on man-made structures they do not qualify for protected status.

#### 20. How will greenhouse gas emissions associated with decommissioning be considered?

An Energy and Emissions study will cover greenhouse gas emissions as part of broader impact assessment and to inform the Comparative Assessment. It will include onshore energy and emissions, as well as emissions from marine vessels and helicopters. OPRED guidance on assessment requirements will be followed.

### 21. Will noise abatement measures be considered as part of the noise impact assessment for cutting the jacket legs and footings?

YES, noise modelling will be undertaken once there is clarity on the potential cutting mechanisms, including potential mitigations such as bubble curtains. Guidance is being sought from government advisors, notably JNCC, to support these efforts and assessments.

CNR International are conscious of the need for greater data in this area and are actively pursuing opportunities for collaboration to support the collection of data that could be informative in future projects. This might, for example, include the installation of hydrophones during leg cutting activities.

#### 22. How large is the drill cuttings pile and what will happen to it?

The volume of drill cuttings beneath Ninian Southern is estimated at c39,000 m3, rising 17.5 metre high against the 9.2 metre diameter western jacket leg. OSPAR Recommendation 2006/5 generally advocates non-disturbance of drill cuttings, but removal methods for drill cuttings will be explored and the effects of disturbing or not disturbing the cuttings will be assessed.



#### **SOCIETAL INTERESTS**

#### 23. What efforts will be made to secure reuse opportunities for the platform topsides and jacket?

Reuse is first on the list as a potential option in the waste hierarchy, although this is likely to apply to elements of the platform rather than reuse of the facilities as a whole. To date, no viable re-use option for the facilities as a whole have been identified, not least because of the age of the structure and difficulty in maintaining it on an ongoing basis, but also because of the distance from shore. Material condition is well understood, through annual inspections and repair work carried out in recent years, and this will be considered further when examining reuse and, thereafter, recycling options.

#### 24. Will the wider impacts of the decommissioning on the economy be considered?

YES, in the sense that any comparative assessment of options would consider the value of e.g. onshore disposal to the community.

#### 25. Where will the Ninian Southern Platform be taken once removed from its offshore site?

This remains to be determined. All large steel jackets have their differences but face the same consideration of removal in a single lift or multiple sections. The location is more likely to be influenced by the type of removal vessel: for example, semi-submersible crane vessels cannot currently unload to quayside in the UK due to water depth, although this can be overcome if the jacket can be unloaded to a transfer barge.

#### 26. How will you capture the societal value of the platform for posterity?

Plans are currently being considered to capture the societal, cultural and historic legacy of the Ninian field assets, including the role played by thousands of onshore and offshore workers over the decades and the community this created. CNR International recognises the significance of the Ninian assets to the UK's industrial legacy and their importance to the communities who served them.

#### COMPARATIVE ASSESSMENT OF DECOMMISSIONING OPTIONS

#### 27. What is a Comparative Assessment?

A Comparative Assessment is a process used in decommissioning planning which examines five key criteria – safety, environment, societal and technical, plus cost as a differentiator where other criteria are equal – to identify optimum solutions, notably for the fate of particularly large structures which were originally installed before 1998 without being designed for future removal. OPRED's regulatory guidance covers the requirements in more detail, while OSPAR Decision 98/3 (especially Annex 2) explains the rules about derogation from the obligation of full removal. The first stage in assessing decommissioning options is to establish the possibilities for full removal. If this is unachievable, evaluation of feasible alternative options will be considered.

#### 28. Will there be a comparative assessment of decommissioning options for Ninian Southern?

There will be no Comparative Assessment of options for the topsides and upper jacket as these will be fully removed, but one is expected to be undertaken for the lower jacket and footings. This will align with the OPRED <u>Guidance Notes</u> to enable a broad and evidence-based assessment of potentially feasible options leading to an emerging recommendation set out in a report for regulatory and stakeholder review and to inform the Decommissioning Programme proposals.

# 29. Are CNR International engaging external authorities to validate the recommendations for the lower jacket & footings decommissioning?

YES. The appointment of an Independent Review Group is in progress. Their role will be to verify the basis for and inputs to the plans to ensure that they are well founded. As with previous decommissioning projects, their report will be made public.

#### **FURTHER INFORMATION**

#### 30. How is CNR International's stakeholder engagement being conducted?

CNR International are committed to early and ongoing engagement. The first stakeholder workshop for Ninian Southern has already taken place and this has led to the initiation of bilateral and multilateral meetings with, for example, academic researchers, fisheries representatives, regulatory advisors and offshore navigation bodies. These meetings will continue during the development of plans and beyond as required. Further engagement will cover consultation on the scope of environmental assessments, the emerging recommendations from the Comparative Assessment of options before they are finalised, and the formal statutory and public consultations triggered by the submission of the draft Decommissioning Programmes to OPRED.

# 31. Who should I speak to for more information or to be added to the stakeholder register for notifications about engagement opportunities?

Please contact CNR International using this email in the first instance: decom.international@cnrl.com