

Summary – Responses – Espoo procedure

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Responses – The Nederland			
No.	Response/statement	Answer form Wintershall Noordzee B.V	Comments from the Danish Energy Agency
Ministry of Infrastructure and Watermanagement			
1	Ministry of Infrastructure and Watermanagement (Espoo point of contact) don't have any remarks on the consultation regarding the "Decommissioning of the Ravn field".	-	-
Responses – Germany			
No.	Response/statement	Answer form Wintershall Noordzee B.V	Comments from the Danish Energy Agency
Bundesamt für Seeschifffahrt und Hydrographie (BSH)			
1	<p>From the point of view of the Federal Maritime and Hydrographic Agency (BSH) with regard to spatial planning, the described activities of the project "Decommissioning of Ravn Field " are located in the designated areas for oil and gas exploration of the Danish Maritime Spatial Plan. The provisions of the Danish plan are in principle in line with the provisions of the maritime spatial plan for the German EEZ in the North Sea.</p> <p>Concrete statements and information about the compatibility of the project with maritime shipping and the marine protected area Doggerbank in the German EEZ can only be obtained from the competent German public authorities for shipping and nature protection.</p>	-	The Danish Energy Agency has noted the comments on this topic.
Bundesamt für Naturschutz (BfN)			
2	<p>Assessment of possible cross-border impacts due to platform dismantling activities</p> <p>The Ravn platform is located 15 kilometres from the border with the German EEZ and the Dogger Bank FFH area (DE 1003-301), which has been designated as a nature reserve. The platform will be completely dismantled in accordance with international regulations (OSPAR) and the boreholes sealed. Impacts from underwater noise (cutting work, continuous noise) on marine mammals as well as land use or amendments to the FFH-LRT 1110 "Sublittoral Sandbanks" (simultaneously a section 30 biotope) and sedimentation are to be classified as local, small-scale and generally temporary in terms of intensity and distance. Significant adverse effects on the "Doggerbank" Nature Reserve (also an FFH area) due to the dismantling of the platform are not to be feared due to the distance and avoidance of noise-intensive work (impulse noise).</p> <p>To date, the BfN has only been aware of noise measurements carried out in the course of the B4-5 and B11-4 exploration wells for Wintershall [Dea]. Annex 14 (section 5) states that no measurements of underwater noise have been carried out or are reliably known for certain activities of relevance to dismantling. The topic of dismantling offshore facilities will become very important in the future. It is therefore suggested that noise measurements (and possibly monitoring of marine mammals) during dismantling – especially when cutting</p>	<p>Wintershall understands the importance of collecting information on underwater noise for future (decommissioning) projects. Nevertheless, Wintershall is of the opinion that the underwater noise levels that could potentially be measured will be of limited use for future decommissioning projects due to the following reasons:</p> <ul style="list-style-type: none"> In the German EEZ only two offshore oil/gas platforms are present being A6-A and Mittelplate. Mittelplate is situated in the Elbe delta, lies very close to shore and is not built on a jacket. Offshore wind will become an important decommissioning industry in future, but Wintershall is of the opinion that the applied decommissioning techniques for the offshore wind farms, and hence the profile of the related underwater noise, are not comparable with the decommissioning techniques applied for offshore oil/gas assets. The vast majority of the noise created during the decommissioning activities will come from cutting the platform piles (abrasive water jet cutting). The well conductors are already cut. Noise is present for a very limited time only. The cutting is expected to take place in the magnitude of hours when cutting the platform piles. 	<p>The Danish Energy Agency has evaluated the characteristics of the noise emitted during the work and does not find that it will have any significant impact, which negates the necessity of monitoring. It is especially the fact that the noise emitted is of low-frequency, broadband and continuous character, that ensures no potential significant impact on the environment can occur. The Danish Energy Agency does therefore not require monitoring of underwater noise emission during the decommissioning project.</p> <p>The Danish Energy Agency has noted the comments and has no further comments.</p>

	<p>drill pipes, platform legs and pipelines – should be carried out and the said measurements made available to the informed public in an appropriate form.</p> <p>Assessment of possible cross-border impacts due to the dismantling of pipelines and cables</p> <p>In the case of all dismantling methods described above, it can be assumed as a rule that there will be no or at most small-scale and temporary cross-border impacts, particularly for the Habitats Directive habitat type 1110 “Sublittoral sandbanks” (simultaneously a section 30 biotope).</p> <p>In choosing the dismantling method, the BfN believes that long-term positive effects due to the permanent restoration of the original sediment conditions without anthropogenic structures should be weighed against short-term adverse effects due to work in the sediment and accordingly assigned a special weighting.</p> <p>The BfN requests further information and involvement in the further procedure.</p>	<ul style="list-style-type: none"> • There is no metal-to-metal contact when cutting the piles and the noise is expected to be continuous (low frequency). Pulsive noise is not generated during the operations. • Cutting takes place 3 m below seabed resulting into limited transfer of noise into the water column. • According to the EIA, noise levels are not expected to exceed the threshold for triggering permanent hearing damage of cetaceans (harbour porpoises, minke whale or white beaked dolphin) or seals. Fish may flee from noisy areas, but this will not affect fish populations. • When the piles are cut, the loose parts are lifted out of the seabed. No vibrations are applied which is probably in contrast to the removal method applied on large diameter subsea structure of a wind mill. • Furthermore, deploying and retrieving noise measurement equipment with a vessel will introduce additional noise and creates additional emissions, where the added value of such measurement is questionable. <p>Prior to determining the pipeline decommissioning scope, Wintershall performed an Comparative Assessment (CA) where the short- and long term effects of several decommissioning scenarios are evaluated. A study was also performed by ARSU (Arbeitsgruppe für regionale Struktur-und Umweltforschung GmbH) to evaluate the environmental impact for several removal scenarios. This study was used when performing the CA. In the CA also other impacts are evaluated (safety, social, technical and commercial). As stated in the HSEQ Policy of Wintershall Noordzee, Health, Safety and Environment has the utmost priority in all operations carried out by the company. This policy justifies high weighting for Safety (35%) and Environment (30%) in the overall evaluation of the CA which ensures that safety and the environment make the most important contribution to the final assessment. The overall evaluation resulted in a recommendation for leaving the pipeline in situ which has the least overall impact. The results of the CA are summarized in the Environmental Impact Assessment.</p>	
Bundesamt für Infrastruktur Umweltschutz und Dienstleistungen der Bundeswehr			
3	There are no objections from the Bundeswehr.	-	-
Ministerium für Energiewende, Klimaschutz, Umwelt und Natur des Landes Schleswig-Holstein			
4	Due to the large distance of the project from coastal waters of Schleswig-Holstein, impairments can be excluded.	-	-