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| NSTA logo |
| Decommissioning Variation Application |
| Advice to Industry |
|  |
| May 2022Version 3 |



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|  Guidance and advice document for planning proposed subsea pipeline works associated with decommissioning. |

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# Abbreviations

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| BEIS | Business, Energy and Industrial Strategy |
| COP | Cessation of Production |
| DepCon | Deposit Consent |
| DPN | Disused Pipeline Notification |
| EMT | Environmental Management Team |
| ESDV | Emergency Shutdown Valve |
| FEPA | Food and Environment Protection Act |
| FPSO | Floating, Production, Storage and Offloading |
| HSE | Health and Safety Executive |
| MAOP | Maximum Allowable Operating Pressure |
| NSTA | North Sea Transition Authority  |
| ODU | Offshore Decommissioning Unit |
| PWA | Pipeline Works Authorisation |
| SEPA | Scottish Environment Protection Agency |
| WGS | World Geodetic System |

Recommendations

# Initial Meeting

An initial kick off meeting should be held between an Operator and the NSTA Consents & Authorisations team at least a year in advance of proposed pipeline works. This meeting will be to discuss the Pipeline Works Authorisation (PWA) Variation requirements and timings for submission of portal applications.

The Operator should complete the ‘Proposed application summary’ Spreadsheet. This must be submitted to the NSTA in advance of the initial meeting. This will allow time for review and to prepare the guidelines and requirements.

[Proposed Application Summary Template.xlsx (sharepoint.com)](https://ogauthority.sharepoint.com/%3Ax%3A/r/sites/CAA/_layouts/15/Doc.aspx?sourcedoc=%7B77DD5AB1-461D-4E8E-85BF-3116DFFE37DA%7D&file=Proposed%20Application%20Summary%20Template.xlsx&action=default&mobileredirect=true)

[PWA Decommissioning Variation Template Coversheet.docx](file:///C%3A%5CUsers%5Chhancock%5CAppData%5CLocal%5CMicrosoft%5CWindows%5CTemporary%20Internet%20Files%5CContent.Outlook%5C365OHALT%5CDecommissioning%20Template%20Coversheet.docx) – I cant access this link

# Timings

Please refer to the NSTA website for current timings for portal application submissions. The NSTA requires 6 months on receipt of a satisfactory PWA application to progress through to the consent approval.

[North Sea Transition Authority (NSTA): PWA applications - Pipeline Works Authorisations - Consents - Licensing & <br/>consents (nstauthority.co.uk)](https://www.nstauthority.co.uk/licensing-consents/consents/pipeline-works-authorisations/pwa-applications/)

There is a mandatory consultation stage which lasts 28 days to allow all consultees to provide technical feedback and/or approval on the proposed works. For particularly large scopes of works please do allow sufficient timings for the NSTA to review and consider your application. Therefore, the PWA applicant may consider arranging corresponding meetings with HSE, BEIS ODU and BEIS EMT to discuss works and schedule.

# PWA Variation Approval Process

* An initial kick off meeting should be arranged by the Operator to discuss timings, project work scope and the PWA Variation submission guidance.
* If the field is planned for Decommissioning, then a COP document will be required for submission to the NSTA for review and approval. No works may be undertaken even to decommission pipelines without COP approval and associated consents discussed below. – this may change but left as is for now
* Final satisfactory portal application received which will be forwarded to consultees for review. All consultees are asked to respond within 28 days.
* The applicant should discuss all environmental requirements with BEIS Environmental Management Team (EMT) early in the process. EMT can be contacted at bst@beis.gov.uk. The NSTA are unable to issue PWA Variation consent unless the associated supporting environmental permit(s) have also been approved.
* The applicant has to submit a Pipelines Safety Regulations (1996) notification to the HSE, i.e. Regulation 22 “Notification in other cases”. For further information see <http://www.hse.gov.uk/pipelines/notification.htm>
* Once any objections have been resolved or if no comments have been received, the legal PWA Variation consent documents will be prepared and approved. The PWA Variation contains the legal terms and conditions under which the proposed pipeline works have been approved and must be adhered to.

# Offshore Pipeline Definition

Under Part 3 of the Petroleum Act 1998 an authorisation is required for the construction and/or use of a “pipeline” in “controlled waters”. For these purposes, controlled waters mean the territorial sea adjacent to the UK and the sea in any area designated under section 1(7) of the Continental Shelf Act 1964.

The Energy Act 2008 defines pipelines as a *“pipe or system of pipes (excluding a drain or sewer) for the conveyance of anything, together with all apparatus, works and services associated with the operation of such a pipe or system”*. This includes pipelines used for the conveyance of hydrocarbons, water, chemicals, apparatus for the supply of energy for operations, hydraulic control lines or umbilical’s, as well as services (for example the provision of fuel or power).

# Table A

A completed Table A must be provided for each pipeline/umbilical and to show variation to existing line(s) as left on the sea bed once the cutting and disconnection works have concluded.

* **From & To**  – Please provide the ‘from’ and ‘to’ end points of the pipeline including associated co-ordinates in WGS84 format *01013’ 41.37” E*. The ‘from and ‘to’ points for each ident will reflect what is at the very end of the component part in column 5.
	+ Please ensure the direction the product is transported is correctly displayed in the Table ‘A’, for example a Services Umbilical should start at the FPSO/Platform or Manifold and go to the Well as the service will be coming from the FPSO/Platform.
	+ **There should be a flow throughout the table.. For example, the ‘To’ point of ident 1, should also be the ‘from’ point of ident 2. .**
	+ Cut point locations will affect the flow of the Table A and in this instance the OGA would accept this instruction cannot be completely followed.
	+ If the pipeline is being cut then there should be a description along with cut point location co-ordinates in WGS84 format, example “Cut Point A *530 34’ 09.11” N 020 13’ 21.37 E”.*
* **Component Description**  – This is a description of the main component of a pipeline, for example *12” Rigid Tie In spool*. **It should be used to describe the component part of the pipeline between the points referenced in the From and To points. .** This can also include description of other components such as blind flanges and valves.
* **Length**  – This should be shown in metres and is required for each ident.
* **Pipeline Dimensions**  – The pipeline dimensions for external, internal diameter and wall thickness must be included and are shown in millimetres.
* **Insulation/Coating**  – A description should be included detailing the type of insulation and/or coating.
* **MAOP**  – This is the ‘Maximum Allowable Operating Pressure’ and it refers to the wall strength of a pressurized cylinder such as a pipeline and how much pressure the walls may safely hold during normal operation. There is no requirement to display a figure within this column of the Table A in association with decommissioned pipelines. The NSTA will agree to “N/A” in these circumstances only.
* **Products Conveyed**  – There should always be a product conveyed (what is in the pipeline) in the ‘Products to be conveyed’ section within the Table ‘A’ and **‘N/A’ or ‘None’ will not be accepted**. If a pipeline is to be flushed in preparation for decommissioning, then this should be referenced as ‘out of service filled with seawater’ as an example. The order of flow is expected to correspond with the direction of flow while the pipeline was in use. **When displaying products for an umbilical pipeline these should be grouped together i.e. 4 x HP Hydraulic.**
* Appropriate footnotes should be provided in the ‘Special Features’ box which will show below the Table A providing clarification regarding works or supplementary information not available in the table. For example, “Pipeline PLXXX will be cut at Point A and Point B with the ESDV and approximately 5 metres of the pipeline recovered back to shore”.
* Co-ordinates must be provided in the Pipeline header section for the ‘From’ and ‘To’ locations. Any cut or disconnection points must also have co-ordinates provided.

# Table A Schematic

Schematic drawings for associated Table A(s) must be simple, well laid out and of a high resolution to provide ease of review for NSTA and consultee.

* The information supplied on the schematic must match the related Table A exactly, with regards to idents and the main From/To points.
* Schematic should clearly display pipeline number in the correct format, ident number(s) and annotations for the main start/end points exactly as described in the Table A.
* Cut points or disconnect points must be annotated on the schematics.
* No company branding or logos will be accepted on the pipeline schematic.

# Electric Cables

* Operators should submit a Table A and Schematic following the guidelines mentioned above for any electrical cables on the seabed that have not been covered by the PWA. These lines will have been laid under FEPA/SEPA and never recorded under the current PWA regime. The NSTA will allocate a pipeline number which will be used to track and record data on the line. The NSTA only require information on electrical lines used for the control of subsea infrastructure and pipeline systems.

# Health and Safety Executive (HSE)

* Operators are reminded to engage with the HSE early in the decommissioning process to discuss any specific requirements or conditions.
* Notification to HSE is required of any significant change to a pipeline which affects the level of risk, such as changes in the operating regime, e.g. change in fluid and cessation of use of the pipeline. Operators have to submit a Pipelines Safety Regulations (1996) Notification to the HSE, under Regulation 22 “Notification in other cases”.

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# Environmental Permits (BEIS)

* Operators should submit all required permits to BEIS EMT in good time. These permits will require a Statutory 28 day consultation period, which should run concurrently with the NSTA consultation as these environmental permits support the pipeline works authorisation.

# Pipeline Deposits

* A Deposit Consent is for the support and protection of a pipeline authorised under the PWA, if the deposit is not for this; contact BEIS EMT to apply for a Marine Coastal Access Act (MCAA) licence.
* The NSTA will allow up to a 12 month period to lay deposits in connection with decommissioning campaigns.
* There are two classifications of deposits, permanent and temporary. Details of permanent deposits must be included in the variation application.. Temporary deposits may be outlined in the application but are included for information only.
* The NSTA do not require confirmation of actual deposited figures once the proposed works have been completed.

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# Agreement Letters

* Draft crossing letters can be found on the NSTA Webpage - [North Sea Transition Authority (NSTA): PWA applications - Pipeline Works Authorisations - Consents - Licensing & <br/>consents (nstauthority.co.uk)](https://www.nstauthority.co.uk/licensing-consents/consents/pipeline-works-authorisations/pwa-applications/)
* If an Operator is flushing the pipeline system only, then block crossing, telecom crossing, pipeline crossing and median line agreement letters will not apply. This must be noted in the main text of the application.
* Pipeline(s) that are to be cut and removed may require inclusion of the necessary agreement letters and the appropriate discussions between essential parties should take place at the earliest convenience.
* All necessary final signed and dated agreement letters should be attached to the application prior to the 28 day consultation period.
* An application that does not contain the required letters will not be considered as “satisfactory” by the NSTA and will not progress to the consultation stage. **This may have an effect on your proposed works deadline and this is at the Operators risk.**

#  As Built Notifications

* On completion of the works the Operator is required to report back to the NSTA on what works were/were not completed. For each application and pipeline within the application the operator must complete the As built Notifications to confirm whether the works carried out exactly as per consent or if works were not carried out exactly as per consent i.e. the consent document states the pipeline will be disconnected at the Manifold however, this could not be achieved and the line is still connected. In this instance a new Cat 2 application type would need to be applied for to update the records and show the pipeline in its current state.

# Disused Pipeline Notification (DPN)

# A disused pipeline notification will be requested by BEIS ODU once the NSTA has issued the necessary legal consent documents. Noting is only the NSTA consent that allows you to alter/modify your pipelines.

* The Interim Pipeline Regime is intended to ensure out of use lines do not pose a risk to other users of the sea or the environment and that they are covered by an appropriate surveying and maintenance regime **from the point when they are taken out of use until approval of the formal decommissioning plan** (which is usually at the end of field life).
* The completed DPN form should be emailed to the nominated contact in BEIS ODU for review and approval.

Please contact the North Sea Transition Authority (consents@nstauthority.co.uk) regarding any enquires or amendments to the Decommissioning Variation Advice to Industry document.



[**www.nstauthority.co.uk**](http://www.nstauthority.co.uk)

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