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| **Decommissioning Variation Application** |
| Advice to Industry |
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| **July 2017****Version 1** |



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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 |
| ODU | Offshore Decommissioning Unit |
| OGA | Oil & Gas Authority |
| 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 OGA 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 applications.

The “Decommissioning Template Coversheet” (see link below) must be completed by an Operator in advance of the initial meeting to allow the OGA to prepare the guidelines and requirements for the PWA Variation application.

[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)

# Timings

Please refer to the OGA website for current timings for application submissions. The OGA requires 6+ months on receipt of a satisfactory PWA application to progress through to the consent approval. It is recommended that draft application(s) should be issued to the OGA for review at least three months prior to the earliest start of works date to allow sufficient time to complete the end to end process.

<https://www.gov.uk/guidance/oil-and-gas-infrastructure#guidelines-for-the-completion-of-pipeline-works-authorisations>

There is a mandatory consultation stage which lasts 28 days to allow all consultee to provide technical feedback and/or approval on the proposed works. 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 OGA for review and approval. No works may be undertaken even to decommission pipelines without COP approval and associated consents discussed below.
* A draft application should be submitted to the OGA allowing checks and any additional information to be requested from the company prior to full submission and processing of the application.
* Final satisfactory application received which will be forwarded to consultee for comment (these are generally government departments and OGA technical field team). All consultee 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 emt@beis.gov.uk. The OGA 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.
* The OGA will inform consultee of the issue of the PWA Variation Consent Document.

# 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 means 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.

* **Table Title Headers** – Pipeline name, Applicant as per Companies House, project name, PWA number (XX/W/XX) if known and drawing reference number(s) must be included on every page where a Table ‘A’ is displayed.
* **Pipeline Number (Col.1)** – A pipeline number must be displayed on every page of the associated Table ‘A’ in the format PL1111, PLU1111 or PL1111 (Cont.) for example. There must be no spaces or any form of punctuation within the pipeline number, unless this forms part of a manufactured bundle (PL1111.1).
* **Ident Number (Col.2)** – These must be in the format 1, 2, and 3 for example.
* **From (Col.3) & To (Col.4)** – In row 1 there must be both ‘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 in columns 3 and 4. For example, the ‘To’ point of ident 1, should also be the ‘from’ point of ident 2. Ident 1 ‘From’ point must match the Row 1 ‘From’ point, with the last ident matching the ‘To’ point in Row 1.**
	+ 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 (Col.5)** – 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 columns 3 and 4.** This can also include description of other components such as blind flanges and valves.
* **Length (Col.6)** – This should be shown in metres and is required for each ident. The total length of the pipeline should be shown in row 1 (**please ensure the sum of all idents matches this total**).
* **Pipeline Dimensions (Col 7, 8 & 9)** – The pipeline dimensions for external, internal diameter and wall thickness must be included and are shown in millimetres.
* **Insulation/Coating (Col.10)** – A description should be included detailing the type or insulation and/or coating.
* **MAOP (Col.11)** – 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 OGA will agree to “N/A” in these circumstances only.
* **Products Conveyed (Col.12)** – There should always be a product conveyed (what is in the pipeline) in column 12 of 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 displayed beneath 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 in the Table A must comprise of 8 digits and be presented in WGS84 format (*01013’ 41.37” N)*. They must be displayed in row 1 of columns 3 and 4 (main “From” and “To” points) along with any cut point/disconnection/lay down locations referenced.

# 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 OGA and consultee.
* These must be no more than A4 in size.
* 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.
* 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 OGA will allocate a pipeline number which will be used to track and record data on the line. The OGA 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”.

# 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 OGA 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 OGA 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 using the supplied DepCon table as an example. Temporary deposits may be outlined in the application but are included for information only.
* The OGA do not require confirmation of actual deposited figures once the proposed works have been completed.

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# Agreement Letters

* The PWA Variation application template section 2.6 - 2.9 provides guidance on various agreement letters.
* 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 included in 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 OGA 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 Left Table A and Schematic

* As left table A and schematic is only required on completion of the pipeline works to confirm if there have been any variation to what was consented by the OGA. For example if an operator were cutting a piece out and the exact length and co-ordinates were not known (say they said it would be a 10-20 m section) this impacts on co-ordinates and the final length of the line on the sea bed and would require an update to the consent documents. Otherwise what has previous been supplied and what the OGA consent should be final documents. An Operator in this case should just need to email their case officer and confirm the works have been completed exactly as consented.

# Disused Pipeline Notification (DPN)

* 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 programme** (which is usually at the end of field life).
* A disused pipeline notification will be requested by BEIS ODU once the OGA has issued the necessary legal consent documents.
* The completed DPN form should be emailed to the nominated contact in BEIS ODU for review and approval.

Please contact Malcolm Cowie (malcolm.cowie@ogauthority.co.uk) at the Oil & Gas Authority regarding any enquires or amendments to the Decommissioning Variation Advice to Industry document.



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