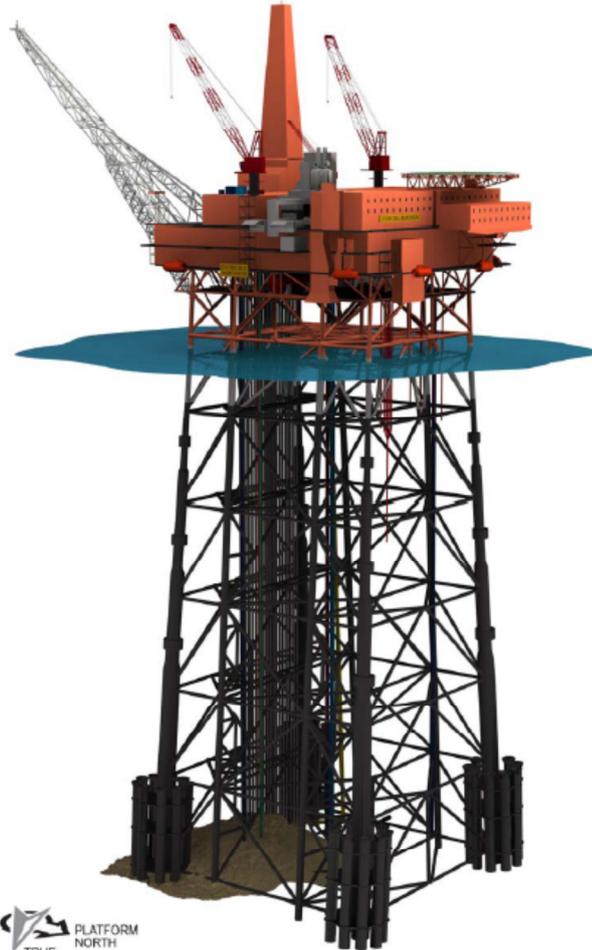




CNR International



MURCHISON FIELD DECOMMISSIONING STAKEHOLDER ENGAGEMENT REPORT

20 May 2013

MURDECOM-CNR-PM-REP-00233

PREFACE

This Stakeholder Engagement Report is part of a suite of documents that support the Murchison Field Decommissioning Programme¹.

It is being submitted to the Department of Energy and Climate Change (DECC) and is available as part of the statutory consultation alongside the Comparative Assessment Report², Environmental Statement³, and Independent Review Consultants' Final Report⁴.

These documents are all available online at www.cnri-northsea-decom.com on the Decommissioning Programme page

¹ Murchison Field Decommissioning Programmes – MURDECOM-CNR-PM-REP-00232

² Murchison Decommissioning Comparative Assessment Report – MURDECOM-CNR-PM-REP-00225

³ Environmental Statement for the Decommissioning of the Murchison Facilities – MURDECOM-BMT-EN-REP-00198

⁴ Murchison Decommissioning Comparative Assessment – Final IRC Report – MURDECOM-XDS-PM-REP-00062

CONTENTS

PREFACE	2
CONTENTS	3
1 INTRODUCTION	4
2 COMMITMENT TO STAKEHOLDER ENGAGEMENT	7
2.1 Identification of Stakeholders	7
2.2 Independent Review Consultants	8
2.3 Summary of Main Stakeholder Groups	8
2.4 Engagement Strategy	8
2.4.1 Best Practice	8
2.4.2 A Tailored Approach	9
2.4.3 A Dedicated Website	9
2.4.4 A Stakeholder Focal Point	10
3 KEY ELEMENTS OF THE ENGAGEMENT PROGRAMME	11
3.1 Baseline Environmental Survey Scoping	11
3.1.1 Environmental Impact Assessment Scoping Report	11
3.2 Stakeholder Workshop (1) – March 2012	13
3.3 Stakeholder Workshop – Follow Up Meetings	15
3.3.1 Scottish Oceans Institute/NERC Sea Mammal Research Unit (March 2012)	15
3.3.2 Decom North Sea (March 2012)	15
3.3.3 Aberdeen Grampian Chamber of Commerce (April 2012, February 2013)	16
3.3.4 FLTC (April 2012)	16
3.3.5 Greenpeace Research Laboratories (April 2012, January, April, May 2013)	16
3.3.6 RSPB (April 2012)	18
3.3.7 JNCC with Marine Scotland (April 2012)	19
3.4 Comparative Assessment – Incorporation of Stakeholder Views	19
3.5 Comparative Assessment – Follow Up on Stakeholder Concerns	21
3.6 Stakeholder Workshop (2) – Report Back to Stakeholders	22
3.7 Additional Actions Arising	23
3.8 Other Stakeholder Engagement	25
3.8.1 CNRI Employees and Contractor Crew (Offshore and Onshore)	25
3.8.2 Murchison Partners	25
3.8.3 Government Departments (DECC)	26
3.8.4 Other Government and Regulatory Agencies	26
3.8.5 Statutory Consultees	27
3.8.6 Industry and Environmental Umbrella Organisations	27
3.8.7 Supply Chain and Representative Organisations	28
3.8.8 Commercial Partners with Infrastructure Links to Murchison	28
3.8.9 Section 29 Non-Equity Companies	29
4 NEXT STEPS	30
4.1 Formal Consultation	30
4.2 Consultation Results	30



5	APPENDICES	31
	APPENDIX 1 External Stakeholder Organisations	32
	APPENDIX 2 List of External Participants in the Stakeholder Workshop Held 14 March 2012	35
	APPENDIX 3 List of External Participants in the Stakeholder Workshop Held 8 November 2012	37
	APPENDIX 4 Comparative Assessment Workshop: Stakeholder Concerns and Expectations Pre-Read	38

To be added post consultation:

<i>APPENDIX 5</i>	<i>Copy of Public Notice(s)</i>	
<i>APPENDIX 6</i>	<i>Consultation responses from Statutory Consultees/CNRI Replies</i>	
<i>APPENDIX 7</i>	<i>Consultation responses from Other Stakeholders/CNRI Replies</i>	

1. INTRODUCTION

This report sets out the measures which CNR International (UK) Limited (CNRI) has taken to engage with stakeholders during the development of the decommissioning programme for the Murchison platform and its related subsea infrastructure. It summarises the company's approach to engagement and the programme to support this, highlighting issues, concerns and expectations which have been raised during the dialogue and the way in which these have been addressed.

For those who have not yet read the related documents (described in the Preface) which underpin the Draft Decommissioning Programme, it is worth noting that the development of decommissioning options for Murchison has followed investigation of all potential alternative uses for the platform (including reuse and recycling), a raft of studies and a full comparative assessment for the key removal and disposal options for the platform jacket, drill cuttings and pipelines.

The comparative assessment weighed the options against five key criteria as required by the Department of Energy and Climate Change (DECC)⁵: safety risk to personnel (offshore, onshore and to the fishing community), environmental impacts, societal impacts, technical and economic aspects. The starting point for assessment of the decommissioning options was complete removal in order to leave a clean seabed, within which the possibility of partial removal was also considered.

The comparative assessment process and outcomes are described in full in the Draft Decommissioning Programme and its supporting documents, notably the Comparative Assessment Report and Environmental Statement, underpinned by the supporting studies used as the basis for the programme's development and submission to the UK Government.

Following the statutory consultation on the Draft Decommissioning Programme, the Stage 2 Decommissioning Programme will be formally submitted to DECC. The latter will incorporate responses to the statutory consultation received by CNRI by the consultation closing date (12 July 2013) and the company's replies to these.

To summarise, the Draft Decommissioning Programme describes the proposed activities for the Murchison Field, namely that:

1. All platform and subsea wells will be plugged and abandoned in accordance with Oil & Gas UK Guidelines.
2. The platform topside modules will be removed and returned to shore for reuse, recycling or disposal.
3. It is recommended that the jacket be removed down to the top of footings at 44m above the seabed and returned to shore for reuse, recycling or disposal. The jacket footings would then be left in place.
4. The drill cuttings pile located within the jacket footings will be left *in situ* to degrade naturally with time.

⁵ www.gov.uk/government/uploads/system/uploads/attachment_data/file/69754/Guidance_Notes_v6_07.01.2013.pdf

5. On completion of the decommissioning programmes a seabed survey will be undertaken to identify oilfield related debris within the platform 500m zone and a 200m wide corridor along each pipeline. All items of oilfield debris will be categorised and in consultation with DECC a management and recovery plan will be agreed. Following completion of the recovery plan, verification of seabed clearance by an independent organisation will be carried out.
6. The short early production pipeline bundles and associated subsea equipment will be removed and returned to shore for recycling or disposal.
7. The main oil export line PL115 will be left *in situ* with remedial rock placement over exposed sections. The main pipeline tie in spools, at either end, will be removed and returned to shore for recycling or disposal.
8. The Murchison gas import riser PL165 will be decommissioned and isolated at the subsea riser tie-in spool as part of the Murchison Field decommissioning programme. This will be in preparation for the future decommissioning of PL165 by the NLGP System Owners.

2. COMMITMENT TO STAKEHOLDER ENGAGEMENT

CNRI recognises that constructive two-way dialogue with its stakeholders is essential for long-term, sustainable operations and is fundamental to developing the best decommissioning programme possible.

Stakeholders are defined as any individual or group with an interest in or some aspect of rights in ownership of a decommissioning project who can contribute in the form of knowledge or support, or who can impact or be impacted by the project, its work or outcome, or have views on these matters.

From the outset of planning for the decommissioning of the Murchison Field, the company has sought to develop relationships and dialogue to best meet stakeholders' needs and expectations and inform the development of the best possible set of proposals. The approach adopted by CNRI has focused on developing close working relationships with interested parties, establishing confidence and trust to share understanding and identify where additional opportunities and ideas can usefully be explored. The company is committed to transparency and to making available to stakeholders in a timely manner all information and data that can reasonably be provided, as well as to treating all stakeholders equally.

Communication of the various issues and concerns raised by the decommissioning studies along the way so that they are understood and can be properly considered by stakeholders has been a priority, as has gaining stakeholders' feedback and views on decommissioning scenarios to inform the development of the best possible plans.

The engagement programme has provided important input into the company's decision making process, complementing – although not replacing - the statutory approvals process or CNRI's own approvals process.

2.1 Identification of Stakeholders

There are many and varied stakeholders associated with the decommissioning of Murchison, each with their own spectrum of interests and remit. The first task for CNRI, having embarked on its pre-planning programme, was to develop a rounded communication programme which would meet stakeholder needs.

The programme started with an initial identification of potential stakeholders within the context of their respective interests. This was undertaken by ascertaining:

- Known interest in issues specific to the project or to decommissioning
- Other relevant decommissioning projects
- Stated interests and remit
- Area of operations, national and international
- Known involvement with or interest in stakeholder engagement in other decommissioning projects
- Working history with CNRI and ongoing relationships

Additional stakeholders were added during the planning 'journey' where gaps were identified or requested involvement. A full list of the current stakeholders for the purposes of engagement on the comparative assessment and preparation of the Decommissioning Programme appears at Appendix 1.

2.2 Independent Review Consultants

As a further check to provide reassurance to stakeholders, CNRI appointed independent review consultants⁶ (IRC) to verify the completeness of the pre-planning studies and to confirm the methodology for and adherence to the comparative assessment process adopted by the company for determining the way forward. The IRC posed many challenging questions in its oversight of the project which acted as an initial proxy for broader stakeholder review, ensuring that the foundation on which the comparative assessment process was built was robust.

2.3 Summary of Main Stakeholder Groups

The main stakeholder groupings for the Murchison decommissioning pre-planning were identified as follows:

- CNRI employees and contractor crew (offshore and onshore)
- Murchison partners
- Government departments
- Government and regulatory agencies
- Industry and industry organisations
- Local authorities
- Environmental non-governmental organisations (NGOs)
- Commercial partners with infrastructure links to Murchison
- Supply chain and representative organisations
- Section 29 Non-Equity notice holder (companies with ongoing liabilities towards Murchison)
- Statutory consultees

2.4 Engagement Strategy

2.4.1 Best Practice

While members of the CNRI Decommissioning Team have extensive experience gained from other relevant projects over the last decade, the Murchison decommissioning is nevertheless a first for CNRI as a company. It was therefore considered important to understand and anticipate as fully as possible the potential issues which could arise during the development of the project.

With respect to stakeholder engagement, an early priority was to inform development of the communications programme incorporating best practice examples. Five operators assisted CNRI with this informal learning through a series of one-to-one meetings (BP, ConocoPhillips, Fairfield Energy,

⁶ The role of the Independent Review Consultants is described in their Final Report – MURDECOM-XDS-PM-REP-00062

Marathon and Shell) together with industry organisations Oil and Gas UK, Decom North Sea, OPITO (the oil and gas industry's focal point for skills learning and workforce development) and the Energy Industries Council.

2.4.2 A Tailored Approach

Throughout the pre-planning and as a result of the conversations with other operators CNRI has been conscious of the demands on stakeholders from a range of sources, reported by some as 'stakeholder fatigue', not least borne out of pressure on their resources (time and financial), particularly amongst environmental non governmental organisations.

The strategy adopted for communication was therefore to develop a tailored approach to consultation wherever possible, adapted to the needs of stakeholders rather than a 'one size fits all approach,' with relationships, built on individual and tailored contact sensitive to the communications needs and preferences of each.

This approach informed the discussions throughout the pre-planning stages and will continue to underline the ongoing stakeholder engagement programme to ensure that views are captured and issues addressed in the most constructive way possible as the project moves forward into the execution phase.

Bilateral and, in some cases, multilateral update meetings with stakeholders according to their preferences have been held in order to share news on progress, stimulate discussion, understand expectations, address and resolve any potential issues and seek collaborative opportunities.

In recognition of the benefits of sharing views and priorities on the five key criteria which formed the basis of the comparative assessment, stakeholders were also invited to attend two workshops (described below), held in March and November 2012.

2.4.3 A Dedicated Website

To facilitate the sharing of information and to act as a portal for those seeking information on the decommissioning pre-planning process – including those not previously identified by CNRI as key stakeholders but who nevertheless have an interest – a dedicated website was established at an early stage at www.cnri-northsea-decom.com, including an enquiry and response interface.

The website will also play a significant role in the statutory consultation which accompanies submission of the Decommissioning Programme. DECC Guidance Notes⁷ state that "*operators will need to develop and manage a wide-ranging public consultation process*" and Oil & Gas UK has also published guidelines⁸ on stakeholder engagement. Both clearly specify the use of the internet to inform

⁷ www.gov.uk/government/uploads/system/uploads/attachment_data/file/69754/Guidance_Notes_v6_07.01.2013.pdf

⁸ Initially these appeared as the UKOOA Guidelines on Stakeholder Engagement for Decommissioning Activities, (2006), see www.oilandgasuk.co.uk/publications/viewpub.cfm?frmPubID=219, since replaced (2013) by UK Oil & Gas Guidelines on Stakeholder Engagement during Decommissioning Activities, available online at www.oilandgasuk.co.uk/publications/index.cfm

stakeholders and to publish documents for formal consultation on decommissioning programmes. A Stakeholder Focal Point

Engagement and communications activities have been managed throughout the pre-planning phase by the Stakeholder and Compliance Lead who acts as a single contact point to broker connections between CNRI and its audiences. The Stakeholder and Compliance Lead will continue to facilitate engagement during the statutory consultation period of the draft decommissioning programme (see section 4.1), as well as beyond in any subsequent derogation application and thereafter for the final decommissioning application.

3. KEY ELEMENTS OF THE ENGAGEMENT PROGRAMME

3.1 Baseline Environmental Survey Scoping

As part of the pre-planning process, CNRI met with the DECC Environmental Management Team, the Joint Nature Conservation Committee (JNCC) and Marine Scotland in December 2010. The objective was to not only provide an overview of current decommissioning activities and intentions but to specifically discuss proposals for scope of the baseline environmental survey to establish the current state of the subsea environment on the basis of data from literature and field surveys, and to agree the way forward.

This resulted in agreement that the survey scope met the requirements of all parties, with JNCC confirming that it presented a good assessment of the options being considered. Marine Scotland subsequently provided the Oil and Gas UK Platform Specific Surveys Report 2005/6 which supplemented the background material for the survey scope.

The methods for the physical, chemical, and faunal analysis of survey samples, based on appropriate OSPAR⁹, JAMP¹⁰ and OLF¹¹ guidelines, were defined by CNRI and shared with participants. Marine Scotland confirmed that they were based on recognised guidelines and, as such, met the regulatory requirements.

The presence of *Lophelia pertusa* on the Murchison jacket was also highlighted by CNRI who sought advice from JNCC on what would be considered a “significant” growth that would trigger the requirement for an Appropriate Assessment.¹² JNCC formally responded in writing, recommending an assessment of the extent and distribution of this cold water coral on the legs of the installation to be reported in the Environmental Statement. They further advised that as the coral would not have occurred without the presence of the platform, mortality as a result of decommissioning operations would not be considered as an issue of significant concern for the Environmental Impact Assessment. At JNCC’s request, CNRI agreed to provide samples of *Lophelia pertusa* from the marine growth survey conducted in 2011.

Copies of the baseline environmental survey¹³ were subsequently provided to all parties in February 2012 and discussed in outline at the meetings with the parties held in April 2012.

3.1.1 Environmental Impact Assessment Scoping Report

In June 2011, the draft Environmental Impact Assessment (EIA) Scoping Report for the project was published¹⁴ on the dedicated project website. Designed to establish the issues, data requirements, and

⁹ OSPAR 2004/11. Guidelines for Monitoring the Environmental Impact of Offshore Oil and Gas Activities

¹⁰ JAMP 2002/16. Guidelines on Quality Assurance for Biological Monitoring in the OSPAR area

¹¹ OLF 2003. Guidelines for Characterisation of Offshore Drill Cuttings Piles (www.olf.no)

¹² An appropriate assessment (AA) is required under the Habitats Directive (92/43/EEC) for any plan or project likely to have a significant effect on European sites designated for nature conservation, and is used as a decision making tool to determine whether the activities can go ahead

¹³ Pre-Decommissioning Environmental Survey Report for the Murchison Field MURDECOM-ERT-EN-REP-00056

¹⁴ www.cnri-northsea-decom.com/Documents/MURDECOM-BMT-EN-REP-00036%20REVC1.pdf

impacts to be addressed through specific investigation, CNRI was keen to encourage comment by interested parties so that views could be taken on board from an early stage in defining the scope of the environmental studies and confirming the brief to the contractors who would undertake them.

Statutory consultees were alerted to the availability of the Scoping Report by post that month with telephone and email follow up, while the broader stakeholder group was contacted in August and early September 2011 by telephone and email (with the report) to establish interest and offer the opportunity to comment. This also served as a useful means of introduction and relationship building. Where stakeholders were not available by telephone despite repeated attempts to speak, email contact (with copies of the report) was made. In mid-September, reminder emails were subsequently sent to those who had not already commented.

Substantive comments were received from two key stakeholders (the National Oceanography Centre and the International Research Institute of Stavanger – IRIS Biomiljo), while a third stakeholder, Georgia Baylis-Brown (an MSc student in Environmental Science at University of East Anglia) sought clarification on how CNRI would be approaching the environmental studies and conducted a detailed review of the Scoping report. The main substantive points raised by stakeholders are summarised as follows:

- Contamination of the marine environment is considered to be the most important issue, and modelling of the fate of the contaminants is encouraged.
- There may be significant fishing activity within the Murchison Field by vessels registered in countries outside UK.
- It very important to consider the "legacy" impacts of anything left behind, and compare these with the short-term impacts of the actual decommissioning work.
- Marine growth may fall off the structure during transit to or at the demolition yard, which has the potential to introduce marine invasive species.
- The Murchison jacket may be currently acting as an artificial reef providing shelter for fish; removal of the jacket will remove any positive impacts that may be associated with fish recruitment.
- Cumulative impacts of leaving pipelines in place should be considered.
- Impacts associated with resource usage and atmospheric emissions should be considered for all decommissioning options.

CNRI provided individual responses to stakeholder comments describing how any concerns would be addressed within the final Murchison Environmental Impact Assessment, and a revised version of the EIA Scoping Report incorporating the responses was published on the website in February 2012¹⁵. All stakeholders were alerted to its availability by email in February 2012. Since then, Table 6.2 of the Environmental Statement identifies the influence on the Murchison EIA of these comments and specifies where details of outcomes can be found.

¹⁵ Murchison Decommissioning EIA Scoping Report – MURDECOM-BMT-EN-REP-00036 Rev C

In addition to those who responded with specific environmental points, several stakeholders used the contact as an opportunity to draw attention to points which they considered needed to be incorporated into the planning for the broader Decommissioning Programme. These included comments from the International Marine Contractors Association (IMCA) who registered their views on contracting strategies and the need to anticipate the inherent risks and the nature of the decommissioning work and potential cost implications; and that safety issues should be no different for decommissioning than for construction.

Meanwhile, the International Marine Organisation (IMO) expressed a preference not to comment but drew attention to the London Protocol Guidance with particular reference to 1) the Specific Guidelines for Assessment of Platforms or other Man-Made Structures at Sea and 2) a similar document on the Disposal of Organic Matter (Fouling on Rigs in Off- or Near-shore areas). This information was shared with CNRI's environmental consultants.

The Royal Yachting Association also noted that they may be interested in commenting at a later date in respect of impacts on cruising routes which could be impacted by additional vessel movements during decommissioning and provided a copy of the RYA Cruising Atlas for reference purposes.

The Aberdeen Grampian Chamber of Commerce also put a link to the Scoping Report on its website in order that interested members had the opportunity to comment if they wished.

3.2 Stakeholder Workshop (1) – March 2012

Building on the contact established with stakeholders during informal consultations on the EIA Scoping Report, CNRI held its first stakeholder workshop. The overall aim of the workshop was to provide an opportunity for stakeholders to hear about and give feedback on the pre-planning for decommissioning the Murchison platform and the options to be taken forward into the comparative assessment process. A total of 37 external stakeholders¹⁶ participated.

The Environment Council, an organisation which specialises in stakeholder engagement, was commissioned to work with CNRI to design the workshop and to independently facilitate the discussions.

The specific objectives of the workshop were to:

- Brief participants on the Murchison platform context, decommissioning approach and plans.
- Brief participants on the progress of the decommissioning studies to date and indications of the decommissioning options and likely issues and challenges for the platform.
- Review the approach to decommissioning and engagement with stakeholders.
- Collectively discuss the issues and challenges faced by decommissioning the Murchison platform.
- Gain feedback from participants on the proposed decommissioning option(s) in particular any perceived gaps in technical studies to date and priority issues for further consideration.

¹⁶ See Appendix 2: List of External Participants in the Stakeholder Workshop Held 14 March 2012

Within this framework, a shared understanding of decommissioning options being taken forward into the comparative assessment was achieved with respect to (primarily) the platform jacket, drill cuttings and pipelines. Questions were answered as fully as possible, while additional general considerations and opportunities to be explored were also highlighted. This included a request that Subsea UK be included on future stakeholder engagement, followed up by CNRI after the workshop.

A full report of the meeting was published online¹⁷ shortly after the workshop, including agenda, project overview, transcript of proceedings, slides, attendance and invitation details, plus evaluation. Its availability was notified to stakeholders by email and further comment invited.

Stakeholder questions and remarks were subsequently collated by CNRI with other input received from other stakeholder contact described in this report as part of the pre-briefing for the Comparative Assessment Workshop held in May (see section 3.4 and Appendix 4)¹⁸ and to enable views and expectations to be taken into account in the development of the broader decommissioning programme.

No follow up comments were received from stakeholders who had been present at the workshop in response to the workshop report, other than from those resulting from separate meetings. Separately, IMCA asked to be kept advised about decommissioning progress and requested that direct liaison on contractual issues be undertaken without its facilitation. IMCA's Decommissioning Contracting Principles were once again cited as the benchmark for commercial discussions with the Association's members – an area considered by the organisation as being beyond the scope of stakeholder communications. These Contracting Principles were shared with other members of the decommissioning team, including those responsible for contract strategy development.

Seven further meetings were held post-workshop to discuss CNRI's approach to the Murchison decommissioning planning and emerging issues, both with those who had been present on 14 March and who wanted to follow up on particular issues as well as with those who were unable to attend. These meetings comprised:

- Scottish Oceans Institute/NERC Sea Mammal Research Unit (St Andrews) (March 2012)
- Decom North Sea (March 2012)
- Aberdeen Grampian Chamber of Commerce (April 2012)
- FLTC (April 2012)
- Greenpeace Research Laboratories (April 2012 with further discussions in 2013)
- RSPB (April 2012)
- JNCC with Marine Scotland (April 2012)

These are summarised in the following section. A further meeting was also held with DECC's Environmental Management Team in April 2012 to discuss the points raised in the workshop presentations in more detail as part of a general update session since they were unable to be present at the March stakeholder workshop or the JNCC/Marine Scotland meeting held earlier in April.

¹⁷ See <http://www.cnri-northsea-decom.com/Stakeholder-Engagement.htm> Stakeholder workshop 14 March 2012, Aberdeen: final agenda; overview pre-read; slides from proceedings; report of proceedings

¹⁸ See Appendix 3: Comparative Assessment Workshop: Stakeholder Concerns and Expectations – Pre-Read

3.3 Stakeholder Workshop - Follow Up Meetings

3.3.1 Scottish Oceans Institute/NERC Sea Mammal Research Unit (St Andrews) (March 2012)

A meeting was held with a representative from the Scottish Oceans Institute (SOC) and NERC Sea Mammal Research Unit of St Andrews University to provide a summary overview of the information shared at the stakeholder workshop and to answer any queries arising.

Within the discussion which followed, it was made clear that one of their key areas of interest was the approach to the drill cuttings pile since where jacket footings could be left in place this could have the advantage of protecting cuttings piles from disturbance and therefore obviate the potential for related marine contamination problems which they were anxious to avoid.

The issue of habitats provided by subsea infrastructure and the potential for their loss as a result of removal of structures was another concern, particularly given the limited scientific research existing on this. Following the meeting, CNRI provided video footage of the Murchison jacket legs from the most recent platform survey for informal review of biological communities and as a precursor to potential further study.

3.3.2 Decom North Sea (March 2012)

Building on the discussions both at the stakeholder workshop and on regular contact at industry events and meetings, CNRI met with Decom North Sea to discuss potential opportunities for further engagement with the supply chain.

CNRI identified three separate needs for such engagement, notably in relation to 1) Murchison decommissioning; 2) longer term initiatives to stimulate interest in and awareness of future needs to persuade contractors that it is worth investing in the development of new technologies and/or thinking about the transferability of skills to decommissioning applications to increase market opportunities; and 3) reuse opportunities which could fulfil environmental, cost and market goals.

Decom North Sea were keen for CNRI to share details of contracting strategies with the supply chain at an early stage, although there was understanding that this could be commercially sensitive. Timing would be a matter of judgement. It was agreed that if an engagement session were to be held with the supply chain it would need to focus on the scope of the removals and the anticipated timeline, if it were to be of value. Ideas were discussed which Decom North Sea took away to consider further. These were subsequently developed by Decom North Sea into a flagship industry event in March 2013, Decom Offshore 2013, for which CNRI contributed further to the preparation, presentation and participation.

It was also agreed that links with other industry and enterprise organisations would be of benefit – something that CNRI was already pursuing through participation in industry events, speaking opportunities and conference attendance.

3.3.3 Aberdeen Grampian Chamber of Commerce (April 2012, February 2013)

A meeting was held with the (then) Executive Chair of the Aberdeen Grampian Chamber of Commerce as a follow up to the stakeholder workshop in March to more fully understand intentions regarding well plugging and abandonment for the Murchison Field and also to explore how the Chamber could broker links with members and CNRI.

The Chamber of Commerce undertook to establish the possibility of running a decommissioning or re-use theme in its Business Bulletin and to discuss with Decom North Sea what interest might exist for a combined approach to stimulating local market for re-use of surplus equipment. Further, the stakeholder offered to use his local and oilfield business network to assess the feeling of contemporary companies regarding the interest in such an opportunity and revert back to CNRI with anything relevant that emerged.

A further meeting was held with the Chamber of Commerce in February 2013 to follow up on opportunities for collaboration, as a result of which a presentation on Murchison decommissioning programme contract opportunities was scheduled for Chamber members and others for June 2013.

3.3.4 FLTC (April 2012)

CNRI met with the UK Fisheries Offshore Oil and Gas Legacy Trust Fund Ltd (FLTC) to provide a briefing on the stakeholder engagement workshop which they had been unable to attend. (An initial introductory meeting had previously been held with the FLTC in August 2011.

Within the discussion, FLTC raised concerns about the suitability of buoyancy tank assembly methods of large jacket removal. The nature and extent of seabed debris around the platform and along pipeline PL115 in the context of potential risk to fishing risk was also explored and CNRI's plans for a debris clearance sweep (and verification) explained.

Discussion followed on how debris is currently logged and about the plans for a debris sweep post-decommissioning. FLTC undertook to consider the issue at the next meeting of the Seafish Industry Authority's technical body and to look at processes for information capture if not already in place. FLTC further advised that work was being done to establish whether data related to the oil and gas industry in Norway could be amalgamated into a comprehensive data set for the Northern North Sea.

FLTC made clear the desirability from a fishing perspective of a clean seabed, despite the heat and/or shelter advantages which infrastructure could provide to marine life.

There was further discussion of the concerns expressed to CNRI by the fishing community regarding trenching of pipeline PL115. FLTC observed that if the pipeline location was known and recorded on charts and the FishSafe system, fishermen using these should be alert to potential risks, as at present.

3.3.5 Greenpeace Research Laboratories (April 2012 and January, April, May 2013)

A meeting was held in April 2012 with Greenpeace Research Laboratories (referred to here as 'Greenpeace') who had been unable to attend the stakeholder workshop the previous month. This

centred on an overview of the key presentations which had been given at the workshop, including the comparative assessment methodology, and related discussion.

Greenpeace acknowledged that as far as review of the stakeholder workshop report was concerned, Murchison had better data for its operations than other platforms, but far less data on topsides contaminants than other operators at a similar stage. They were surprised that more information was not available, particularly in relation to NORM. CNRI confirmed that this was because the platform was still operational and that specific information would be gathered once oil production ceased as part of the Engineering, Down and Cleaning scope. Information is also held internally to CNRI on NORM and its history on Murchison, including Becquerel levels on what has been recovered and this would be useful in helping to inform the process of removal. Greenpeace further noted that NORM was mainly an issue with respect to disposal facilities.

The second area of discussion related to drill cuttings piles, particularly the degree of certainty about adherence to OSPAR Stage 1 thresholds and whether something was missing that could cause an exceedance. CNRI confirmed that it was reasonably confident on this but more concerned about what OSPAR doesn't cover, i.e. sampling deep within the pile. Greenpeace said that it shared this concern in relation to potential dispersal of unknown contaminants which was why there was concern about not proceeding to Stage 2 assessments. CNRI said that a Stage 2 assessment would be considered. (Stage 2 assessment was subsequently undertaken.)

Greenpeace asked specifically about the composition of drilling fluids used: whether alkylphenol ethoxylates (APEs) had been used and whether this was taken into account in the drill cuttings pile modelling. CNRI noted that the drilling fluid records and typical constituents had formed the basis of inputs to the modelling studies using SINTEF and explained the way in which the EIF Dream Partrack Model had been used to build the environmental risk assessment. Post-meeting follow-up of this point confirmed that APEs were not included in the modelling and that therefore predictions cannot be made about their fate from the modelling.

CNRI's approach to using new technology for decommissioning was also discussed, in particular the opportunity for changing the approach if new technology came through by 2016. CNRI clarified the position, i.e. that in its screening of opportunities for new technology unless there was a commitment for it to be built and/or bought by 2014, such options would not be explored since it would introduce too great a degree of uncertainty into the decommissioning programme overall. Delay over a longer period could lead to asset deterioration, compromising removal. Greenpeace asked why there was a departure from this approach on the jacket leg cutting technology and CNRI explained that, in this case, such technology was proven but needed to be scaled up to cope with the size of the Murchison jacket legs.

Cost issues were discussed and CNRI confirmed that the approach was not to rule out anything on cost grounds in undertaking the comparative assessment of options (in line with DECC guidance). That cost should not be the driver for decision making had also emerged as an issue at the stakeholder workshop. The comparative assessment would identify recommended options both with and without cost to confirm that it was not the driver for decision making.

Further meetings were held with Greenpeace in 2013 (January, April and May) to more fully explore the contents of the discussion draft of the report on the Environmental Assessment of Options for the Management of the Drill Cuttings Pile¹⁹. Iterations of the report following the January and April meetings were subsequently shared for further discussion before the report was finalised after the May meeting. These included the results of additional modelling undertaken and revised presentation of the salient points regarding contaminants so that they could be presented in the most transparent and understandable manner possible. A modification was also to the Environmental Baseline Survey report to update and clarify analysis of data to take into account observations by Greenpeace.

CNRI also undertook to revisit questions regarding the presence of tributyltin (TBT) within the scope of the post decommissioning survey.

3.3.6 RSPB (April 2012)

CNRI met with RSPB Scotland in April 2012 since the organisation had been unable to attend the first stakeholder workshop. RSPB described its concerns about any potential impacts on bird life from decommissioning programmes, highlighting not only its responsibilities for coastal reserves on Orkney and Shetland (amongst other land holdings) but also drawing attention to those managed by several other organisations.

The principal area of concern centred on the drill cuttings pile and discussion was held regarding the nature of its contents. The potential impacts which could arise from any release of contaminants into the food chain (e.g. via plankton plumes and sand eels) from cuttings pile disturbance and/or natural degradation were highlighted in particular. RSPB acknowledged that the modelling methods (SINTEF) used by CNRI in the pre-planning studies were in standard use.

Onshore disposal of drill cuttings was considered by the RSPB to be a potential difficulty because of a lack of treatment centres; transportation to shore could also create significant numbers of vessel movements with the potential for impacts on water flows and air/water interface which could adversely affect birds, including flightless birds. CNRI noted RSPB's recommendation that assessment would be useful to identify whether there was an issue for birds if onshore disposal were to emerge as a recommended way forward.

In addition, drill cuttings reinjection possibilities would need to establish with certainty that if this option were adopted the drill cuttings would not be brought above the surface, in line with current restrictions. Any plans to propose that drill cuttings were left *in situ*, meanwhile, could usefully address the possibilities of using plasticized/alginate seals. CNRI undertook to explore this in the consideration of drill cuttings management options.

RSPB also recommended that, while not currently envisaged by CNRI, should any contractor propose the use of explosives during the removal of the jacket, it would be as well for vibration and noise impacts on sea mammals to have been fully addressed in advance. CNRI acknowledged the value of

¹⁹ MURDECOM-BMT-EN-STU-00132, available online at www.cnri-northsea-decom.com from the Decommissioning Programme page

this. In addition to the noise study conducted by CNRI, RSPB suggested that it would be useful to look at studies undertaken by the Scottish Association for Marine Science if explosives use were to be pursued.

RSPB also suggested that Scottish Natural Heritage be added to CNRI's list of consultees on Murchison decommissioning. This suggestion was taken up (see section 3.8.4).

3.3.7 JNCC with Marine Scotland (April 2012)

A meeting was held to brief the Joint Nature Conservation Committee (JNCC) on the information presented at the Stakeholder Workshop and discussions which followed since they had been unable to attend that event, and to go over any issues pertaining to the development of the pre-planning for the decommissioning programme. Marine Scotland were also present at the meeting. Georgia Baylis-Brown, an MSc student from the University of East Anglia who had commented in some detail on the scope of the environmental impact assessment for Murchison, was invited by CNRI to join the meeting as an observer to aid her studies.

A brief overview of the findings of the Environmental Baseline Survey which had been the subject of discussion the previous year was given as a follow up to the report which had already been provided to JNCC, Marine Scotland and DECC's Environmental Management Team earlier in the year.

No significant environmental risk was identified by those present at the meeting from the options outlined by CNRI. However, JNCC sought to fully understand the potential risk of disturbance to the drill cuttings pile and any release of its contents as a result of other operations (e.g. conductor, pipeline and bundles removal). CNRI confirmed that such risk would be covered in the assessment of environmental hazards and environmental impact assessment, reported in the Environmental Statement. Marine Scotland noted two particular challenges which would result from disposal of the drill cuttings for a 'remove to shore' option: first, the difficulties with suction dredging and the potential for water column contamination from backflushing following blockages; and, second, the high water to drill cuttings ratio.

The scale of the challenge of jacket removal was also discussed and to illustrate this further a copy of the original Murchison installation film from 1980 was subsequently sent to both JNCC and Marine Scotland.

3.4 Comparative Assessment – Incorporation of Stakeholder Views

Stakeholder views were reported to the specialist team of 30 CNRI staff and external consultants, observed by two of the Murchison Independent Review Consultants, present at the Comparative Assessment Workshop in May 2012 (described in more detail in Section 5 of the Comparative Assessment Report²⁰).

²⁰ Murchison Decommissioning Comparative Assessment Report – MURDECOM-CNR-PM-REP-00232

This workshop was the forum for bringing together the results and total weighted scores from the individual technical assessment and evaluation workshops held during the previous five months and considering the options to be taken forward. Pre-briefing on stakeholder issues was given to participants (see Appendix 3) in the form of a table collating the range of stakeholder views collected through CNRI's engagement programme, recording the issues and expectations gathered and identifying how and where concerns are (or would be) addressed.

A short presentation was made at the start of each agenda item at the workshop to reinforce to those present specific stakeholder concerns and priorities, set within the context of two overarching – and repeatedly restated – stakeholder expectations: “clean seabed” must be the starting point for option consideration; and “safety first” to ensure that safety rather than cost must drive decision making. These focused on:

Jacket

Potential contamination of the marine environment:

- Loss of marine growth during jacket transit (invasive species)
- Access to footings: drill cuttings disturbance during decommissioning (footings removal, falling objects)

Fishing impacts:

- Continued inaccessibility of current exclusion zone under the partial removal scenario
- Snagging risk from footings left in place (safety and societal issues) under the partial removal scenario

Drill cuttings

Potential for contamination of the marine environment:

- Species and food chain impacts arising from drill cuttings disturbance
- Inability to survey deep within the drill cuttings pile because of access issues means that theoretical modelling – while an established procedure – cannot be fully verified
- Possible long term persistence of contaminants and impacts that could arise from the drill cuttings pile if left *in situ* or redistributed

Fishing impacts:

- The continued inaccessibility of current exclusion zone contrary to early North Sea development promises that all infrastructure would be removed, made before the OSPAR 98/3 Decision

Pipeline

Environment and safety:

- Naturally occurring radioactive material (NORM) – potential environmental impacts in the context of onshore landfill disposal pressures

Fishing impacts:

- Snagging risks that could arise from trenching the hard clay seabed via the creation of berms (seabed ridges) between the lengths of pipeline sections currently covered with rock

Knowledge base:

- Is enough known about the structural integrity (of pipelines) to support proper consideration of all options?

3.5 Comparative Assessment - Follow Up on Stakeholder Concerns

In the period following the March 2012 Stakeholder Workshop, potential methods for sampling the entire depth of the drill cuttings pile were further discussed to identify how technical and structural challenges might possibly be overcome to address the need for greater knowledge of the contents. This discussion continued at the Comparative Assessment Workshop and follow up sessions.

A potential method of sampling has since been identified for implementation once the platform is no longer operational in order to validate the theoretical modelling of the pile. The outcome is described in more detail in the Comparative Assessment Report.²¹ Further discussions have since been held with other operators and specialist contractors to investigate the optimum methods and timings for achieving representative sampling with which to validate the theoretical modelling, both to reinforce understanding of the Murchison drill cuttings pile and those associated with other platforms.

An additional area of interest with respect to drill cuttings was also identified by CNRI which, while not deemed likely to affect the outcome was nevertheless considered desirable to complete the picture for CNRI and stakeholders. A study was therefore commissioned to better understand the impacts resulting from eventual collapse of the jacket footings in order to model the potential impacts on the drill cuttings pile centuries hence.²²

Furthermore, as part of ongoing engagement, the emerging recommendations from the initial Comparative Assessment Workshop and two subsequent related sessions were discussed at bilateral meetings with Marine Scotland (June 2012), JNCC (July and September 2012) and the Scottish Fishermen's Federation (SFF) (July and September 2012) prior to reporting back to the wider stakeholder group.

As a result of the discussions with JNCC and the SFF, CNRI undertook to re-examine the emerging recommendation for rock placement on the 19km oil export pipeline PL115 as opposed to cutting and lifting the 17 exposed sections along its length to a) understand more fully whether this would improve the safety risk to fishermen and b) to determine potential environmental impacts resulting from the introduction of new material compared with either removal or of a leave *in situ* option. The results²³

²¹ Murchison Comparative Assessment Report - MURDECOM-CNR-PM-REP-00225 (see 5.3.7)

²² Murchison Drill Cuttings Pile Modelling Disturbance of Drill Cuttings from the Collapse of the Structural Piles Report - MURDECOM-GEN-EN-REP-00240

²³ PL115 - Post Workshop Actions MURDECOM-CNR-PM-GTN-00226

demonstrated that the rock placement option remained the most appropriate recommendation, particularly when coupled with a series of safety and environmental mitigation measures.

After the September meeting with JNCC, CNRI also conducted a habitats assessment based on existing data for pipeline PL115. The assessment concluded that there were no Annex I Habitats present along the pipeline corridor.

3.6 Stakeholder Workshop (2) – November 2012 Report Back to Stakeholders

CNRI made a commitment at the Stakeholder Workshop in March 2012 to keep stakeholders informed of the outcome of the comparative assessment process on the options for the Murchison jacket, drill cuttings and pipelines.

A second Stakeholder Workshop was therefore held in Aberdeen in November 2012 to share and discuss the comparative assessment results, any stakeholder issues arising and 'next steps'.

The draft Comparative Assessment Report was provided to all stakeholders as a pre-read (whether or not they were planning to attend) charting the way in which CNRI worked to strike a balance of safety, environmental, societal, technical and economic aspects in identifying the options to be presented in the decommissioning programme. A commitment was made to address any issues which stakeholders considered material to the confirmation of the options to be taken forward prior to submission of the Draft Decommissioning Programme to DECC.

The workshop, once again facilitated by The Environment Council, sought to provide briefing and to answer questions through plenary and workgroup discussion sessions and to gain feedback to inform the way ahead. Stakeholders were also invited to contribute to shaping the agenda for the day, although no suggestions were received for this.

Comment on the recommendations was sought from all parties, whether or not they planned to or were able to attend the workshop. CNRI also offered opportunities for stakeholders to meet to discuss any aspect of the proposals.

The stated aims of the 8 November Stakeholder Workshop were:

- To update participants on the activities undertaken since the March 2012 stakeholder workshop, how stakeholder input had been taken into account and the process moving forward.
- To build understanding of the recommendations being proposed for the Murchison platform decommissioning following the comparative assessment and answer any outstanding questions.
- To hear and understand from stakeholders:
 - In respect of the comparative assessment for the Murchison platform, what else (if anything) needs addressing before submission of the Draft Decommissioning Programme;
 - Any issues outside of the scope of the comparative assessment which need to be incorporated into on-going planning.

- Collate the learning on issues arising from stakeholder engagement on platform decommissioning – both in terms of the *content* and the *process* to apply in future by CNRI and others.

In all, 29 external stakeholders attended the November workshop (see details at Appendix 3). One request for a follow up meeting was received from Aberdeen Grampian Chamber of Commerce who also sought clarification of some elements of the wording of the Draft Comparative Assessment Report.

A full (transcript) account of the meeting, including the presentations given by the CNRI team, together with a Summary Report collating points raised by stakeholders was produced and issued to all stakeholders before being published online.²⁴ One stakeholder responded to the circulation of the transcript to suggest that it might be useful for CNRI to follow up a workshop question on assessment of the potential impacts of a tsunami on the drill cuttings pile. This was examined by CNRI and findings recorded in a technical file note on the Murchison Decommissioning Risk Assessment Associated with Long-Term Presence²⁵.

It is worth highlighting the very positive evaluation of the stakeholder event which was given by external participants, included in the transcript report.

3.7 Additional Actions Arising

A core element of the Stakeholder Workshop was a session specifically designed to ascertain whether participants considered that there were any additional matters which needed to be addressed before submission of the Draft Decommissioning Programme. There were none: all of the queries and issues raised by stakeholders in this session had already been accounted for by the company and therefore CNRI responded to them immediately at the workshop.

CNRI also sought to establish whether there were any issues which, while outside of the scope of the comparative assessment process itself, needed to be incorporated into on-going planning for Murchison decommissioning. These are set out, together with CNRI's response, in the table below:

Table 1: Stakeholder Issues and Responses

Issues	CNRI Response
CNRI to consider how/whether to share the weighting information further.	The weightings for the five comparative assessment criteria (safety, environmental, societal, technical and economic) were described to participants on the day and a copy provided to the Health & Safety Executive immediately after at their request. Full descriptions of the methodology and procedure [Comparative Assessment Method Statement MURDECOM-CNR-PM-PRO-00081 and Comparative Assessment

²⁴ www.cnri-northsea-decom.com/Stakeholder-Engagement-02.htm

²⁵ MURDECOM-CNR-EN-TFN-00003



	Procedure MURDECOM-CNR-PM-PRO-00136] are being made available for inspection on publication of the Draft Decommissioning Programme (see Section 4.1).
Show removal timescales as the start on an opportunity envelope; not a fixed point.	This will be made clear on the invitations to tender and clarified in the Draft Decommissioning Programme and in future external communications. This information is also published and will be updated monthly on the DECC Project Pathfinder website.
CNRI to consider providing more information on the timeline and tender process for its own project (and for the industry to consider a high level, industry-wide one) to help the supply chain 'get ready'.	Discussions have been initiated with organisations representing the supply chain, such as Decom North Sea and Aberdeen Grampian Chamber of Commerce, and information being disseminated through presentations at events organised in conjunction with industry groups. Communication will be extended as the programme moves forward.
Can the corrosion rate of the metal in the jacket footings and pipeline be accelerated sooner than 900 years? And is enhancing corrosion beneficial?	CNRI referred this back to its external engineering consultants on materials and corrosion who have advised that practicalities around adding an accelerated and/or chemical corrosive treatment and discharge to the subsea environment would not be likely to meet OSPAR or CHARM regulations. Installing a cathodic protection system in which the footing acts as a sacrificial anode could not be installed for practical reasons as the amount of anode material required is not viable.
Use consistent terminology: 'economic' (rather than 'cost' considerations).	Noted – to be applied where relevant and where it improves the sense.

3.8 Other Stakeholder Engagement

Regular dialogue with interested parties has been a feature of the pre-planning for the Murchison decommissioning on a number of fronts. Updates and meetings beyond those described above which relate most particularly to the comparative assessment and options selection are therefore summarised here for the sake of completeness.

3.8.1 CNRI Employees and Contractor Crew (Offshore and Onshore)

Internal communications within CNRI has been an important focus of engagement for the project. This reflects not only the needs of platform crew for information on how and when they will be affected but also how decommissioning activity will be structured and thus impact on their working lives and wellbeing. Furthermore, the safe operation of the platform both in the lead up to cessation of production and during decommissioning itself is of paramount importance to CNRI.

To this end, in addition to involvement of platform representatives in the two stakeholder workshops, monthly visits to the platform have been undertaken by various members of the decommissioning team since January 2012. These have provided rounded opportunities to speak to crew collectively and in small groups, answering questions and reporting on project progress and intentions. Several project newsletters and bulletins have also been prepared to update platform crew and provide assurances on future opportunities, while articles provided for the in house e-magazine have provided insight for the broader CNRI workforce.

Contractor management companies responsible for provision of the Murchison crew were also given early notification of decommissioning pre-planning activity in November 2010. These companies also took part in a joint briefing with the CNRI Operations and Decommissioning teams in September 2011 which sought to reinforce CNRI's commitment to openness and transparency, sharing information as and when it becomes available, and to working closely with core crew to establish new opportunities post-decommissioning.

3.8.2 Murchison Partners

Regular meetings have been held with Wintershall Norge AS, CNRI's joint venture partners in Murchison. At the formal partner meetings held three times per year, increasing focus has been given to the pre-planning for Murchison and contact beyond these meetings at special workshops and briefings has also been increased to ensure understanding of the developing proposals and secure their commercial support as the programme development has progressed.

Wintershall representatives have also been present at both stakeholder workshops and fully involved in the comparative assessment process – notably the Comparative Assessment Workshop (May 2012) and two related follow up meetings (June and July 2012) where their technical expertise was usefully brought to bear on issues relating in particular to drill cuttings. They also attended two of the update meetings held with DECC (July and November 2012).

3.8.3 Government Departments (DECC)

CNRI have had regular meetings with DECC's Offshore Decommissioning Unit (ODU) (September 2010, March and September 2011, March, July and November 2012, and April 2013) which have primarily focused on progress updates of the pre-planning process leading up to the submission of the Draft Decommissioning Programme. DECC representatives from PILOT, the Environmental Management Team and Licensing have been present at some of these meetings.

DECC was represented at both stakeholder workshops in 2012 and an additional briefing was also conducted for a representative from the DECC Environmental Management Team in April 2012. This meeting also included discussion on the requirements for the application for the MCAA Licence at a later stage.

A separate engagement session was held in March 2012 with representatives from PILOT to discuss potential ways of sharing information from operators involved in decommissioning activities with the UK supply chain.

In addition, CNRI took part of an industry secondment programme organised by DECC to provide its offshore decommissioning officers with insight into the operations of companies preparing decommissioning programmes. As part of this, CNRI provided a member of the DECC team with the opportunity to spend two weeks observing the operations of the company's decommissioning team to gain a better understanding of the approach being taken to the Murchison project and in turn to build awareness of DECC's needs as regulator.

Overall, the contact with DECC has been very helpful in establishing the foundations for the comparative assessment of options and in guiding the gathering and incorporation of stakeholder views. It has also proved valuable for refining presentation of the decommissioning programme using the streamlined decommissioning template, developed as a result of a DECC/Decom North Sea collaboration and including input by CNRI and other operators. The Murchison application will be the first example of a derogation case being put forward using the new template.

3.8.4 Other Government and Regulatory Agencies

In addition to the meetings with JNCC, Marine Scotland and the DECC Environmental Management Team detailed elsewhere in this report, CNRI also met with the Health and Safety Executive in September 2011 to share details of pre-planning activity and to receive guidance on the nature of issues which would be faced as the project developed. The HSE highlighted two phases for action:

- 1) The need for reassurance and certainty during the pre-planning phase to ensure safe platform operations by keeping worry among crew to a minimum; and
- 2) Post-cessation of production, when new challenges and changes (especially upscaling of the personnel on board) will require careful management to ensure health and safety practices are of the highest standard and that wellbeing is not compromised.

The Health and Safety Executive also attended both Stakeholder Workshops.

Meetings were also held with the Scottish Environment Protection Agency (SEPA) to discuss radiological issues. At the first of these, in November 2012, CNRI gave an overview of the Murchison decommissioning status before discussion of specific radiological questions covering such matters as pile densitometer sources, NORM authorisations and variations, and the preparation of a radiological records summary for report back to SEPA post decommissioning.

SEPA subsequently provided written clarification to a number of radiochemical questions after the meeting as guidance for CNRI.

A further meeting was held in December 2012 to discuss the status of the densitometers on the Murchison jacket and the options for their decommissioning.

Contact was also established with Scottish Natural Heritage to ascertain the degree to which they wanted to be involved in the decommissioning planning, following the RSPB's suggestion that they be involved. Their preference was to feedback comment through JNCC, rather than through face-to-face engagement.

3.8.5 Statutory Consultees

An exploratory meeting was held with the Scottish Fishermen's Federation (SFF) in November 2011 to ascertain their preferences for engagement during the pre-planning phase. As a result of this, the organisation was invited to participate in relevant specialist workshops held as a precursor to the comparative assessment process. The SFF provided useful input to these regarding the potential impacts on the fishing community, particularly for pipeline options. To reinforce understanding of the issues facing the SFF and broader fishing industry concerns regarding safety, CNRI participated in a one day SFF-Oil and Gas UK briefing at Fraserburgh Harbour in March 2012.

Later, following the Comparative Assessment Workshop in May (described in sections 3.4 and 3.5), two meetings were held (July and September 2012) with the SFF to explore their views on emerging recommendations to be taken forward in the Draft Decommissioning Programme. As a result, additional analysis was commissioned by CNRI to examine in more detail the risk factors to fishermen, offshore and onshore personnel, based on both cut and lift and rock placement decommissioning options for the 17 exposed sections of the oil export pipeline PL115.

Contact was established and maintained with the National Federation of Fishing Organisations (NFFO) who also attended the first of the two stakeholder workshops.

Invitations were issued to the Northern Ireland Fishermen's Organisation and to Global Marine Systems for both stakeholder workshops and follow up materials provided, although no representatives were available to attend. Invitations for one-to-one briefings were offered but have not yet been taken up.

3.8.6 Industry and Environmental Umbrella Organisations

CNRI has been active in both sharing learning with and learning from industry partners and contractors during the pre-planning phase. Presentations have been given by CNRI on the Murchison decommissioning at numerous conferences and events including the annual PILOT Share Fair event (November 2010), Society of Underwater Technology Conference (December 2011 and March 2013), Subsea UK lunch and learn event (August 2012), Decom North Sea/OGUK conference (October 2011 and 2012), NOF Energy lunch and learn events (January 2011 and 2013), NPF North Sea Decommissioning Conference (February 2011, 2012 and 2013), Decom North Sea's Decom Offshore 2013 Conference (March 2013) and the North Sea Oil and Gas Summit (April 2013). Further opportunities, such as with the Energy Industries Council, were at the time of writing being organised for later in 2013.

Regular attendance at Decom North Sea and Oil & Gas UK decommissioning events and fora throughout the period since late 2010 have provided additional opportunities for both engagement with other operators and the supply chain on a formal and informal basis.

A learning visit to Sellafield was also conducted in November 2011 by members of the Murchison decommissioning team to gain insight into the approach to decommissioning undertaken by other industries. Participation in the Society of Underwater Technology conferences described above also provided useful perspectives on alternative approaches.

CNRI has also taken part in two Scottish Environment LINK events held in November 2012 (annual conference) and February 2013 (two of the Scottish Environment Week meetings at the Scottish Parliament). These provided opportunities to engage informally with members of the umbrella organisation's Marine Task Force (drawn from the environmental NGO community in Scotland), amongst others, and to reinforce the need for those with marine interests to play an active role in shaping the decommissioning debate through early engagement, despite the resource pressures which they face.

3.8.7 Supply Chain and Representative Organisations

Following completion of the initial study work, engagement sessions were held with the removal services contractors in November 2011 and a cross section of the potential decommissioning services contractors to seek their input on the following:

- CNRI's proposed base case for packaging the scope
- How well the scopes will be defined or what measures are recommended to improve definition
- The risks, how controllable they are and who should own them i.e. contractor or CNRI
- What remuneration structures would be appropriate e.g. lump sum, target cost, reimbursable

Similar engagement sessions were also held in October 2012 with well plugging and abandonment companies.

Formal engagement on the invitations to tender subsequently commenced in November 2012 with Tier 1 decommissioning service contract bidders. Informal discussions with Tier 2 and Tier 3 contractors have also been held, particularly at conferences and industry events as mentioned above.

All engagement has been conducted in line with CNRI's contracting procedures.

3.8.8 Commercial Partners with Infrastructure Links to Murchison

While it is beyond the scope of this report to describe the full details of contact with other operators of the subsea infrastructure on which Murchison depends, it is relevant to record here that regular contact has been undertaken with industry stakeholders to explore the impact of and arrangements for Murchison decommissioning on shared, interdependent or nearby facilities. This has included invitations to and participation in the two stakeholder workshops separate from the ongoing liaison undertaken by CNRI's commercial team to ensure understanding of the broader context.

Meetings have been held with BP as operator of the Northern Leg Gas Pipeline and of the Sullom Voe Terminal on the Shetland Islands via the Main Oil Line. Discussions have also been held and are ongoing regarding practical arrangements for and commercial agreements with Fairfield Energy (operators of the Dunlin Alpha platform), EnQuest (operators of the Thistle platform) and Taqa (operators of the Cormorant Alpha platform and the Brent System).

Discussions with Shell have also been held regarding the possibility of tie-backs to the Penguins Field for the provision of gas to Murchison, as well as regarding the Penguins Field pipelines which cross the Murchison oil export pipeline to Dunlin Alpha. These have been taken into account in the development

of the Decommissioning Programme and with respect to the comparative assessment of options for pipeline PL115.

Commercial agreements will ultimately be the mechanism by which the decommissioning relationships will be managed with other operators.

3.8.9 Section 29 Non-Equity Notice Holder Companies

The Section 29 Non-Equity notice holder companies with on-going liabilities towards Murchison were notified in writing of CNRI's intention to commence pre-planning studies for decommissioning in autumn 2010, at which time telephone follow up was made to further explain intentions. The only company to respond to an offer of briefing was Maersk to whom an introductory presentation was given in September 2010.

Presentations will again be offered to these companies on submission of the Draft Decommissioning Programme and launch of the statutory consultation, to be held in Aberdeen and Stavanger as required – the latter in conjunction with CNRI's equity partners Wintershall.

4. NEXT STEPS

4.1 Formal Consultation

In accordance with DECC Guidance Notes, submission of the Draft Decommissioning Programme triggers statutory consultations as required under section 29 (3) of the Petroleum Act. The statutory consultees comprise:

- The National Federation of Fishermen's Organisations
- The Scottish Fishermen's Federation
- The Northern Ireland Fishermen's Federation
- Global Marine Systems Limited

The consultation will run from 31 May to 12 July 2013 and all those with an interest are invited to comment.

As well as the four statutory consultees, stakeholders with whom CNRI has engaged to date are being alerted in writing to the commencement of the consultation, its duration and availability of materials.

Furthermore, announcement of the proposals is being accompanied by the placing of public notices in appropriate national and local newspapers and journals (as advised by DECC). Examples of these and full details of the publications will appear in the post-consultation version of the Stakeholder Report.

The five principal documents²⁶ – Draft Decommissioning Programme, Comparative Assessment, Environmental Statement, Stakeholder Engagement Report, IRC Independent Verification Report and reports verified by the Independent Review Consultants – will be published online²⁷.

Hard copies of the Draft Decommissioning Programme and four key supporting documents will be available for inspection at CNRI's Aberdeen office at St. Magnus House, Guild Street, Aberdeen AB11 6NJ, Monday to Friday during normal working hours (normally 8am to 4pm). Additional supporting documents referenced within these will also be available for inspection by appointment. Please contact Carol Barbone on carol.barbone@cnrinternational.com or 01224 303102 for further information.

4.2 Consultation Results

The results of the statutory consultation on the Draft Decommissioning Programme will be reported in the Stage 2 Decommissioning Programme when formally submitted for approval, at which point (and in line with the DECC guidance) correspondence with interested parties will be appended to this report.

The recommendation that the jacket is only partially removed and that the drill cuttings are left undisturbed will initially be considered by the UK Government who will decide whether to recommend the proposals for approval to the OSPAR Commission as a potential derogation

²⁶ A further document, the Environmental Assessment of Options for the Management of the Murchison Drill Cuttings Pile is also being published online alongside these documents to provide additional insight into this aspect of the decommissioning.

²⁷ See at Decommissioning Programme page at www.cnri-northsea-decom.com.

case in line with the OSPAR Decision 98/3²⁸. Should DECC agree that the proposals being put forward form a suitable derogation case, CNRI will be asked to submit a Derogation Application which the UK government will then issue to OSPAR for consideration by the Contracting Parties. The UK Government has sole responsibility for approval of the decommissioning proposals for the remaining subsea infrastructure.

Once this process has run its course, CNRI expects to submit a Stage 3 Final Decommissioning Programme to DECC, for approval by the Secretary of State, in 2014.

²⁸ www.ospar.org/documents/dbase/decrecs/decisions/od98-03e.doc – OSPAR Decision 98/3 – OSPAR Convention for the Protection of the Marine Environment of the North East Atlantic – The Disposal of Disused Offshore Installations

5. APPENDICES

APPENDIX 1 External Stakeholder Organisations

APPENDIX 2 List of External Participants in the Stakeholder Workshop Held 14 March 2012

APPENDIX 3 List of External Participants in the Stakeholder Workshop Held 8 November 2012

APPENDIX 4 Comparative Assessment Workshop: Stakeholder Concerns and Expectations
Pre-Read

To be added post consultation:

APPENDIX 5 Copy of Public Notice(s)

APPENDIX 6 Consultation responses from Statutory Consultees/CNRI Replies

APPENDIX 7 Consultation responses from Other Stakeholders/CNRI Replies

APPENDIX 1

External Stakeholder Organisations

Aberdeen and Grampian Chamber of Commerce
Aberdeen City Council
Aberdeen Harbour Board
Aberdeenshire Council
BP Exploration Operating Company Limited - NLGP
British Geological Survey
British Marine Federation
Capturing the Energy
CEFAS (Centre for Environment, Fisheries & Acquaculture Science)
Centre for Environmental and Marine Sciences
CNRI platform contractor crew
CNRI platform staff
DECC Head PILOT Secretariat
DECC Offshore Decommissioning Unit
DECC Offshore Inspectorate
Decom North Sea
DEFRA
Dutch Ministry of Infrastructure and Environment
East of England Energy Group
EIC (Energy Industries Council)
European Commission - Representation in Scotland)
Fairfield Energy
FLTC Services Ltd
Friends of the Earth Scotland
Georgia Baylis Brown, University of East Anglia
GL Noble Denton
Global MarineSystems Ltd
Greenpeace Research Laboratories
Health & Safety Executive (Offshore Safety Division)
Highlands & Islands Enterprise
Industry Technology Facilitator
International Marine Contractors Association (IMCA)
International Maritime Organisation

Jim Rae
JNCC
KIMO (Local Authorities International Environmental Organisation)
Lerwick Port Authority
Marathon Oil
Marine Conservation Society
Marine Scotland
Maritime and Coastguard Agency
National Federation of Fishermen's Organisations (NFFO)
National Oceanography Centre, University of Southampton
NOF Energy
NOGEPA (Netherlands Oil and Gas E&P Association)
North Sea Commission
North Sea Regional Advisory Council
Northern Ireland Fishermen's Federation
Northern Lighthouse Board
Norwegian Petroleum Directorate
Offshore Contractors Association (OCA)
OGP
Oil & Gas UK
OLF (Norwegian Oil Industry Association)
OPITO
Plymouth Marine Laboratory
RF-Rogaland Research / IRIS-Biomiljo International Research Institute of Stavanger
Royal Yachting Association
RSPB Scotland
Scottish Association for Marine Science
Scottish Enterprise
Scottish Environment LINK
Scottish Executive (Radioactive Waste)
Scottish Fishermen's Federation (SFF)
Scottish Natural Heritage
Scottish Oceans Institute (University of St Andrews)
Sea Mammal Research Unit
SEPA (Marine Team)
SEPA (Radioactive Waste)

Shell UK
Shetland Oil Terminal Environmental Advisory Group (SOTEAG)
Subsea UK
TAQA Bratani Limited
The Crown Estate
TNO-MEP (Netherlands Organisation for Applied Scientific Research)
University of Aberdeen - Royal Institute of Navigation
University of Aberdeen Business School
Whale and Dolphin Conservation Society
Wintershall Norge AS
WWF
WWF Scotland

APPENDIX 2

List of External Participants in the Stakeholder Workshop held 14 March 2012

Name	Organisation
Elaine Robertson	Aberdeen City Council
George Yule	Aberdeen Grampian Chamber of Commerce
Danny Stroud	Aberdeen Harbour Board
Alistair Reid	Aberdeenshire Council
Alex Mateo	DECC (Offshore Decommissioning Unit)
Bill Cattanach	DECC (PILOT)
Erik Leslie	DECC (Offshore Inspectors)
Tracy Edwards	DECC (Offshore Inspectors)
Brian Nixon	Decom North Sea
Ben Zech	Dutch Ministry of Infrastructure and Environment
Scott McMillan	East of England Energy Group
Neil Mitchison	European Commission Scottish Rep
Katrina Wiseman	Highlands & Islands Enterprise
Gill Dubois	Health & Safety Executive
Pat Naylor	Health & Safety Executive
Sandy Stewart	Health & Safety Executive
Mike Taylor	Independent Review Consultancy
Cliff Johnston	Independent Review Consultancy
Jim Rae	Individual Member, Scottish Wildlife Trust
Anthony Onukwu	Industry Technology Facilitator
Harriet Bolt	KIMO
Tom Piper	KIMO
Calum Grains	Lerwick Port Authority
Derek Moore	Marine Scotland
Neaz Hyder	Maritime and Coastguard Agency
John Paterson	Murchison Platform
Peter Stuart	Murchison Platform
Alan Piggott	National Federation of Fishermen's Organisations
Alistair Corbett	BP Northern Leg Gas Pipeline
Archie Johnstone	Northern Lighthouse Board
Louise Ryan	Oil and Gas UK

Karen Craig	Scottish Enterprise
John Watt	Scottish Fishermen's Federation
Philip Gorvett	Shell UK
Elaine Ball	Shetland Oil Terminal Environmental Advisory Group
Alex Kemp	University of Aberdeen Business School
Kyrre Nese	Wintershall Norge AS

APPENDIX 3

List of External Participants in the Stakeholder Workshop held 8 November 2012

Name	Stakeholder Organisation
Danny Stroud	Aberdeen Harbour Board
Alistair Reid	Aberdeenshire Council
Alistair Corbett	BP Exploration Operating Company Limited - NLGP
John Paterson	CNRI platform contractor crew
Peter Stuart	CNRI platform staff
Julie Benstead	DECC Offshore Decommissioning Unit
Marian Bruce	DECC Offshore Decommissioning Unit
Brian Nixon	Decom North Sea
Sarah Hillyear	Decom North Sea
Terry Kimber	Fairfield Energy
Niall Scott	FLTC Services Ltd (UK Fisheries Offshore Oil & Gas Legacy Trust Fund)
Sandy Stewart	Health & Safety Executive (Offshore Safety Division)
Stewart Millar	Health & Safety Executive (Offshore Safety Division)
Luca Doria	Joint Nature Conservation Committee
Tom Piper	KIMO (Local Authorities International Environmental Organisation)
Calum Grains	Lerwick Port Authority
Emma White	Marathon Oil
Derek Moore	Marine Scotland
Stephan Hennig	Maritime and Coastguard Agency
Don Orr	Noble Denton
Camilla Løvaas Stavnes	North Sea Commission
Louise Ryan	Oil & Gas UK
Peter Gordon	RSPB Scotland
Karen Craig	Scottish Enterprise
John Watt	Scottish Fishermen's Federation
Professor Alex Kemp	University of Aberdeen Business School
Astrid Edvardsen	Wintershall Norge AS
Kyrre Nese	Wintershall Norge AS
Cliff Johnston	Xodus Group (Independent Review Consultants)

APPENDIX 4

COMPARATIVE ASSESSMENT WORKSHOP:

MURCHISON DECOMMISSIONING 10 May 2012

STAKEHOLDER CONCERNS AND EXPECTATIONS - PRE-READ

Introduction

Stakeholder engagement is a fundamental part of CNRI's approach to the development of a sustainable decommissioning programme for the Murchison platform and related subsea infrastructure.

The expectations and concerns of those with a range of interests in the approach to CNRI's planning and the eventual proposals which will eventually be submitted to DECC are of direct relevance to the development of a sustainable decommissioning programme.

Proper consideration and addressing of concerns has a direct bearing on the acceptance of the eventual option selected which will require demonstration of a rounded and inclusive approach. It also has a bearing on the corporate reputation of CNRI in line with the company's commitment to "*...doing it right... and with integrity.*" Ensuring that this first decommissioning project is properly developed and demonstrates to stakeholders that their concerns have been given thoughtful consideration and appropriate weight will impact on the confidence in other decommissioning activity which may take place in the future.

Purpose of this document

This document is designed to familiarise those participating in the Comparative Assessment Workshop on 10 May 2012 with the range of stakeholder views collected over the last 18 months through CNRI's engagement programme.

The matrix below records the issues and expectations which have been gathered and seeks to identify how and where concerns are being addressed.

Participants in the Comparative Assessment are requested to remind themselves of these concerns as a precursor to consideration of specific issues and expectations in assessing the options for jacket, drill cuttings, pipeline and pipeline bundles removal. There will be a short presentation at the start of each of these four option assessment sessions on 10 May to link specific issues to each of these.

Any queries or comments on the contents should be raised with Carol Barbone in advance of the meeting on 10 May.



CATEGORY	STAKEHOLDER ISSUE/EXPECTATION	COMMENT ON HOW THIS IS BEING ADDRESSED	WHERE IS/WILL THIS BE DETAILED?
Stakeholder engagement	Need for ongoing dialogue including with more environmental groups and fishing industry as options identified to enable informed comment	Dialogue continues and is designed to ensure participation from all stakeholders in the project across a range of sectors: the goal is to ensure balance, fairness and transparency	Stakeholder Programme Report
Stakeholder engagement	No single lobby group should have more influence than any other	Dialogue continues and is designed to encourage participation from all stakeholders in the project across a range of sectors: the goal is to ensure balance, fairness and transparency. Efforts are being made to ensure contributions are representative	Stakeholder Programme Report
Stakeholder engagement	Media plan/greater communication about the project	Acknowledged - the website will play a key role in information sharing, reinforced by stakeholder engagement	Stakeholder Programme Report
Stakeholder engagement	Reputational issues must be considered	Corporate reputational issues may influence decisions, but DECC guidance notes suggest that reputational issues should not be included in the CA process.	Stakeholder Programme Report
Stakeholder engagement	Unanswered questions must receive response	Acknowledged - the company is committed to answering all questions received openly and transparently and is active in seeking comment and questions from stakeholders in line with its commitment to transparency	Decommissioning Programme; Stakeholder Programme Report
Stakeholder engagement	More information on studies, timetable and programme, particularly on website, as plans develop	Information will continue to be provided through the website, with increased content, as the way forward becomes clearer	Stakeholder Programme Report
Stakeholder engagement	Options appraisal and outcome of comparative assessments and programme selection must explain reasoning for decisions to facilitate effective engagement	The CA process and subsequent Decommissioning Programme will do this	Comparative Assessment Report; Decommissioning Programme



CATEGORY	STAKEHOLDER ISSUE/EXPECTATION	COMMENT ON HOW THIS IS BEING ADDRESSED	WHERE IS/WILL THIS BE DETAILED?
Stakeholder engagement	More details of the decommissioning process (including costs) are needed to inform the less experienced and facilitate comment	Information will continue to be provided through the website, with increased content as the way forward becomes clearer	Stakeholder Programme Report
Stakeholder engagement	Account needs to be taken of Scottish independence issues and political/economic uncertainties	Acknowledged - though current legislation and guidelines must and will be adhered to until such time as there may be change. The Petroleum Act 1998, incorporating OSPAR requirements (Decision 98/3), remains at the core of the development of the decommissioning programme	Decommissioning Programme
Stakeholder engagement	Precedents will be set by the Murchison decommissioning	Acknowledged - and furthermore the company is committed to ensuring that the precedent for the Murchison decommissioning is led by its corporate philosophy of " <i>...doing it right ... and with integrity</i> "	Comparative Assessment Report; Decommissioning Programme
Stakeholder engagement	IRC audit and verification should be shared to ensure transparency and build confidence	The decommissioning programme will incorporate the publication of a verification statement from the IRC	Decommissioning Programme
Stakeholder engagement	It would be useful to some for video footage of marine growth to be shared	Extensive video surveys have been undertaken and those interested in reviewing these can do so on request	On request
General	Verification of studies should go beyond the company	IRC verification has underpinned the development of plans for the project but all stakeholders and regulators will have the opportunity to review the decommissioning programme and relevant supporting studies used in the CA process as part of the formal statutory consultation	Decommissioning Programme
General	Long term liability must be addressed	The decommissioning programme will address this and will be agreed with the regulator. It is included in cost estimates and takes into account liabilities to safeguard the fishing community	Decommissioning Programme and further discussion with DECC



CATEGORY	STAKEHOLDER ISSUE/EXPECTATION	COMMENT ON HOW THIS IS BEING ADDRESSED	WHERE IS/WILL THIS BE DETAILED?
General	Need to learn from others' programmes	Co-operation with other oil and gas operators and the salvage and nuclear industries has played a key role in informing the approach to the project, both through formal mechanisms (e.g. conferences and published programmes, industry work groups and forums) and meetings with other operators/regulatory authorities. The company's decommissioning team has substantial experience gained from previous decommissioning projects	Decommissioning Programme
General	Need to capture long term feedback and lessons learnt for effective sharing with those to follow	A close-out report will be published at the end of the decommissioning process - anticipated c2019. In the interim, progress will continue to be shared through industry forums, conferences and other appropriate means to facilitate others' preparation for decommissioning	Post-decommissioning Close Out Report; Stakeholder Programme Report
General	There needs to be a good reason to leave anything in place: there will be reputational issues over anything less than clean sea bed. Maximum sustainability should be the goal	DECC's guidelines are based on a sustainability framework and require a balanced assessment to be struck between safety, technical, environmental, societal and cost factors. The CA will seek to achieve this, taking 'clean sea bed' as the starting point. Adherence to the CA methodology will identify the most sustainable option and will follow OSPAR Decisions and Recommendations, UK regulations and company policy	Comparative Assessment Report; Decommissioning Programme
Safety	Safety must be the primary consideration	Safety has the highest weighting within the CA process in reflection of its importance and is a core value for the company	Comparative Assessment Report; Decommissioning Programme



CATEGORY	STAKEHOLDER ISSUE/EXPECTATION	COMMENT ON HOW THIS IS BEING ADDRESSED	WHERE IS/WILL THIS BE DETAILED?
Safety	Workforce engagement and participation vital to safe and successful decommissioning with full training to handle new and emergency scenarios	Internal communications and engagement with the platform crew has gradually increased since the inception of the project and will continue to grow as the way forward becomes clearer, not least through personal contact on offshore visits by the decommissioning team and through the involvement of contractor management companies to ensure safe and smooth operations. Full training to meet the range of needs associated with the decommissioning process will be assured and dialogue to address individual needs and concerns will be provided, with appropriate follow up as required	Stakeholder Report; Programme Strategy; Operational
Safety	Opportunities for consultation regarding onshore disposal of hazardous waste	This will depend on the final destination for waste and selection of contractors will require assurances on community concerns	Stakeholder Report; Programme
Safety	Hazardous waste disposal must be fully addressed	Acknowledged - DECC, SEPA and HSE liaison together with compliance with all current regulations will underpin the development of the eventual way forward with individual contracting companies charged with the disposal process	Environmental Statement; Permits, Licences and Consents Register; Environmental Management System
Safety	Partial removal of jacket legs and pipelines left on the seabed could represent a hazard to non-UK/non-EU (e.g. Norwegian) fishermen if not in possession of relevant language versions of FishSafe, Kingfisher and other marine plotting systems	This is being explored further with the FLTC but initial soundings with the NFFO suggest this is not an issue. The SFF have offered to assist in non-UK stakeholder engagement	Stakeholder Report; Programme
Safety	Absence of information on debris from within the 500m zone could be an issue	Regardless of the final option for jacket removal, all debris within the 500m zone will be removed and independent verification of a clean seabed will be undertaken	Final Decommissioning Close Out Report



CATEGORY	STAKEHOLDER ISSUE/EXPECTATION	COMMENT ON HOW THIS IS BEING ADDRESSED	WHERE IS/WILL THIS BE DETAILED?
Safety	To plan successfully, contractors need to know what needs to be done and when, with the operator providing sufficient accurate information about the structure to be removed so it can be accessed and removed safely, as per IMCA's Decommissioning Contracting Principles	This information has been shared with the company's contracts team and specifications will be developed in accordance with these. Engagement with supply chain will ensure contractors know what work is coming up and has already included sessions to discuss views on contracting strategies. These will continue and will feed into an information pack to be released with invitations to tender.	Tender Packs
Safety	Compliance with certification and standards needs to be demonstrated and included in the safety case	Acknowledged - ongoing consultations with regulators (e.g. HSE) are taking place to ensure compliance	Risk Register
Environmental	The presence of <i>Lophelia pertusa</i> on the legs of the platform requires an assessment of the extent and distribution to present an interpretation of the significance of the occurrence	An assessment has now been carried out and JNCC advise that as <i>Lophelia pertusa</i> would not have occurred without the presence of the platform, mortality as a result of decommissioning operations will not be considered as an issue of significant concern for the EIA. Liaison with the operations team will be held to conduct another more up-to-date assessment in due course as part of platform weight analysis	Environmental Statement
Environmental	Contamination of the marine environment (including food chain) is considered to be the most important issue and modelling of the fate of contaminants encouraged	The EIA scope addresses this	Environmental Statement



CATEGORY	STAKEHOLDER ISSUE/EXPECTATION	COMMENT ON HOW THIS IS BEING ADDRESSED	WHERE IS/WILL THIS BE DETAILED?
Environmental	NORM will need to be fully addressed in the course of time: not many companies are good at dealing with this and precedents will be set by the way this is handled	Meetings with SEPA have been held to secure input on radiological issues. An internal file note on NORM and the history of the platform has been prepared, noting levels (in Becquerels) of what has been recovered. Cleaning work and intelligent pigging has been used to keep pipeline scale under control. Topsides will have to be examined separately on actual cessation of production as part of the Engineer, Down and Clean scope before removal begins	Environmental Statement;
Environmental	Legacy issues must be given full consideration and compared with the short-term impacts of the actual decommissioning work	The EIA scope incorporates acknowledgement of legacy issues and will be addressed in the CA process, as well as in the final decommissioning programme and liaison with DECC	Comparative Assessment Report; Decommissioning Programme
Environmental	Marine growth may fall off the jacket structure during transit to or at the demolition yard, which has the potential to introduce marine invasive species	The EIA scope was amended to incorporate assessment of this concern and a technical note prepared. The issue is being addressed in the CA process	Environmental Statement
Environmental	The potential for the jacket to act as an artificial reef providing shelter for fish and its removal could impact adversely on fish recruitment	The EIA scope has been amended to note this as a stakeholder concern	Environmental Statement
Environmental	Impacts associated with resource use and atmospheric emissions should be considered for all decommissioning options	This accords with the DECC guidance and an energy and emissions report has been prepared to inform the CA process	Comparative Assessment Report; Environmental Statement
Environmental	An environmental baseline survey should be undertaken to provide a more complete picture than initially provided by historical data	This has now been completed and is being used to inform the CA process	Comparative Assessment Report; Environmental Statement; ERT Survey Report
Environmental	Seabed disturbance of removal impacts (particularly those associated with drill cuttings) must be assessed, together with noise impacts	Acknowledged	Environmental Statement



CATEGORY	STAKEHOLDER ISSUE/EXPECTATION	COMMENT ON HOW THIS IS BEING ADDRESSED	WHERE IS/WILL THIS BE DETAILED?
Environmental	Need for recognition that transportation of drill cuttings onshore for landfill could be an issue in Scotland because of space limitations and energy/emissions during transportation; increased vessel movements could also have impacts on birds	Acknowledged	Comparative Assessment Report; Environmental Statement; Drill Cuttings Environmental Assessment
Environmental	Knowledge of what is inside the drill cuttings pile is a critical question to answer before decisions are made	This is acknowledged as a critical issue. It is difficult to access the core with current technology. To try to build the most accurate picture possible in the absence of suitable technology historic data has been used to model the pile core and its long term fate as it degrades. The location of the pile under the main jacket structure creates serious access problems for large coring devices. As such, assessment will be made on the basis of core samples and cuttings pile modelling to develop the best management option for assessment in line with OSPAR recommendations	Comparative Assessment Report; Environmental Statement; Drill Cuttings Environmental Assessment/Modelling Report; OSPAR Recommendation 2006/5
Environmental	Potential of jacket degradation to impact on drill cuttings pile 1000 years hence if derogation case	Assessment will be made on the basis of core samples and cuttings pile modelling to develop the best management option for assessment in line with OSPAR recommendations	Comparative Assessment Report; Environmental Statement; OSPAR Recommendation 2006/5
Environmental	Drill cuttings reinjection must be considered	The CA process reviews this option	Comparative Assessment Report



CNR International

<p>Environmental</p>	<p>The possibility of contamination of nets/catches from the drill cuttings pile and spread of pile cuttings by nets must be considered</p>	<p>Marine Scotland advises that overtrawl field studies have shown little displacement of cuttings from fishing nets, while the SFF advises that fishing trials have resulted in the removal of debris with no oil contamination apparent on the nets. Documentation for the first of these studies is cited by OSPAR in its 'Assessment of the possible effects of releases of oil and chemicals from any disturbance of cuttings piles (2009 update) as 'FSR-ML. Fishing Gear Interference with Cuttings Piles beneath Oil Installations after their Decommissioning – the consequences for contamination spread; Fisheries Research Services Marine Laboratory Aberdeen (unpublished draft report finalised in 2000)'. References for the study cited by the SFF have been requested in order that this may be fully explored.</p>	<p>Environmental Statement; Comparative Assessment; Drill Cuttings Environmental Assessment</p>
<p>Technical</p>	<p>Partial removal could mean not that all 4 jacket legs have to be left in place but that the one sited in the cuttings pile could be left</p>	<p>On further assessment following the raising of this point it is considered that in a partial removal option there would be no benefit to be gained by removing three legs and leaving one in situ. The structural integrity around bracing is the primary concern</p>	<p>Comparative Assessment Report</p>
<p>Technical</p>	<p>Examination of other decommissioning programmes could inform this project, especially where difficulties encountered</p>	<p>Co-operation with other oil and gas operators and the salvage and nuclear industries has played a key role in informing the approach to the project, both through formal mechanisms (e.g. conferences and published programmes, industry work groups and forums) and meetings with other operators/regulatory authorities. The company's decommissioning team has substantial experience gained from previous decommissioning projects</p>	<p>Environmental Statement</p>
<p>Technical</p>	<p>Consultation with third parties (e.g. pipeline owners and other platform operators) is essential to successful development of plans</p>	<p>This is in progress</p>	<p>Decommissioning Programme; Commercial Agreements/Memoranda of Understanding</p>



CATEGORY	STAKEHOLDER ISSUE/EXPECTATION	COMMENT ON HOW THIS IS BEING ADDRESSED	WHERE IS/WILL THIS BE DETAILED?
Technical	More information on well P&A and residual liability issues is required	Acknowledged - and discussions with DECC will inform the eventual plan for long term liability	Decommissioning Programme
Technical	Future technology could provide answers to technical challenges further down the line - there could be a case for delaying decommissioning on this basis	Degradation of the platform over time in anticipation of new technologies is an issue in this regard. Engagement with the supply chain has been undertaken to establish new prospects for overcoming technical challenges and are being considered within limits. The focus to date is on exploring existing technologies or those with the backing to be successfully brought to market in order not to be let down during the decommissioning process, but liaison continues to take place in case viable solutions can be brought forward. New types of vessel and other technologies will be considered for future decommissioning activity	Stakeholder Programme Report
Technical	The use of proven technology is essential in identification of jacket removal	Technical assessment and the CA main session will address this	Comparative Assessment Report
Technical	Technical appraisal must be based only on the options for jacket removal but the main CA workshop must address potential effects on the cuttings pile in considering final jacket removal options	The CA main session will address this	Comparative Assessment Report
Technical	For pipelines, justification will be required to support any areas where knowledge is limited e.g. structural integrity of the pipelines	Acknowledged	Comparative Assessment Report
Technical	Potential technical issues relating to any pipeline trenching (which could impact on societal concerns) must be fully incorporated into the assessment of options	Technical assessment and the CA main session will address this	Comparative Assessment Report



CATEGORY	STAKEHOLDER ISSUE/EXPECTATION	COMMENT ON HOW THIS IS BEING ADDRESSED	WHERE IS/WILL THIS BE DETAILED?
Societal	Final destinations for materials and any economic benefits must be shared when final option identified	This will not be certain until the contracting process is complete but decisions will be shared through the stakeholder programme	Stakeholder Programme Report
Societal	Community concerns about onshore disposal of hazardous waste must be fully addressed	All onshore disposal will be fully compliant with regulations and contracts for disposal will require assurances about community concerns	Ongoing Stakeholder Engagement Programme; Environmental Management System
Societal	Work needs to stay local, preferably in the North East of Scotland and at least in the UK	Supply chain engagement is a key element of ensuring the best solutions for decommissioning are accessible and available, reinforced by an active programme with industry bodies and direct with contractors at home and abroad. Contracts will be awarded in accordance with company contracting principles within the scope of EU competition law.	Stakeholder Programme Report
Societal	Cumulative effects of any derogation case (for jacket and pipelines) must be considered especially for fishing interests	Acknowledged	Comparative Assessment Report; Environmental Statement
Societal	Employment opportunities from decommissioning opportunities must be considered, including training and the development of innovative technology	Acknowledged - socio economic effects are addressed within the CA process. In addition, communication with the platform crew will help to identify training needs and skills development issues. The development of innovative technology will be facilitated by ongoing liaison with the supply chain to identify needs and opportunities	Comparative Assessment Report; Decommissioning Programme; Stakeholder Programme Report
Societal	Supply chain opportunities need to be communicated effectively once option selected to open the market, including with representative trade bodies	Acknowledged - and this will build on the extensive information sharing with the supply chain and its representatives to date, both direct and through industry bodies such as Decom North Sea	Stakeholder Programme Report
Societal	Any trenching of pipelines must ensure proper backfilling to avoid clogging of nets with trenching spoil	Acknowledged - this will be factored into the comparative assessment and contracting strategy	Comparative Assessment Report



CATEGORY	STAKEHOLDER ISSUE/EXPECTATION	COMMENT ON HOW THIS IS BEING ADDRESSED	WHERE IS/WILL THIS BE DETAILED?
Societal	Pipeline plugging must be considered	This is subject to consideration within the technical assessments conducted as part of the CA process	Comparative Assessment Report
Societal	At the start of the oil boom fishermen were promised a clean seabed - this must not be forgotten simply because of cost.	DECC guidelines require a balanced assessment to be struck between safety, technical, environmental, societal and cost factors and the CA will seek to achieve this, taking 'clean sea bed' through full removal as the starting point.	Comparative Assessment Report; Decommissioning Programme
Societal	There may be significant fishing activity within the Murchison Field by vessels registered in countries outside the UK and must be incorporated into assessments	The EIA scope was amended to note this stakeholder response and a report into socio-economic impacts on fishing has been undertaken to take account of this	Comparative Assessment Report; Commercial Fisheries Socio Economic Impact Study
Societal	Partial removal of jacket legs and pipelines left on the seabed could represent a hazard to non-UK/non-EU (e.g. Norwegian) fishermen if not in possession of relevant language versions of marine plotting systems	Kingfisher Information Services advise that the five languages chosen for translation of data for FishSafe charts, online notices, information and downloads - the only project of its type in Europe - represented the key EU fishing nations working with the EU sector. The information was gained after consulting with both fishing and offshore oil and gas industries. FishSAFE is also widely promoted throughout the major fishing exhibitions of Europe and Kingfisher state that they receive excellent feedback from fisherman as to its importance and uptake. The SFF has offered to assist in non-UK stakeholder engagement in connection with the decommissioning programme through relevant organisations and trade bodies	Stakeholder Programme Report



CNR International

CATEGORY	STAKEHOLDER ISSUE/EXPECTATION	COMMENT ON HOW THIS IS BEING ADDRESSED	WHERE IS/WILL THIS BE DETAILED?
Economic	Cost must not drive decision making at the expense of safety (though the ALARP principle can be used to inform assessment of options)	DECC guidelines require a balanced assessment to be struck between safety, technical, environmental, societal and cost factors (with cost only acceptable as the main driver IF all other matters show no significant difference). Nevertheless, the company's own CA process acknowledges the importance of safety. The use of the ALARP principle is noted.	Comparative Assessment Report
Economic	Economic criteria, if incorporated in the full CA procedure, will require sufficient assessment of option scoring to avoid being compromised by confidentiality restraints. Publication of economic criteria is desirable in the interests of transparency	Acknowledged. This will be considered	Comparative Assessment Report