

Hornsea Offshore Wind Farm

Project Two

The Applicant's response to E.ON E&P's Oral Representations

**Appendix K to the Response submitted for Deadline V
Application Reference: EN010053**

12 November 2015

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**Appendix K – Response to Oral Representations made by E.ON E&P UK Ltd
(E.ON E&P) at the Issue Specific Hearing on 27 October 2015**

E.ON E&P Comment	Applicant’s Response
<p>Complaint about apparent suggestion by the Applicant (in ES) that there are no hydrocarbon assets in Zone 2;</p>	<p>The ES states at paragraph 11.5.75 of Volume 2, Chapter 11: Infrastructure and Other Users of the ES (Doc ref No 7.2.11)) that there are no existing hydrocarbons fields in Subzone 2. This refers to figure 11.8 which was information provided by the UK Oil and Gas Data 2014.</p>
<p>insufficient attention paid by the Applicant to assets/works in “categories 2 & 3”;</p>	<p>Category 2 by its definition is information provided to the applicant after submission with regard to development of the licence Block 48/3. During the ES consultation this information was not shared with the Applicant and it therefore could not be assessed.</p> <p>The information which was provided by E.ON E&P to the Applicant was with regard to the potential for the licence block 48/3 to be offered for licence in the 28th round. The pre-submission information provided by E.ON E&P did not include any of the potential development scenarios included as Category 2. A letter from E.ON E&P in July 2014 with regard to the Block 48/3 application advised that “the success case” would see 3 to 4 wells drilled at Newton. No further development scenario was presented.</p> <p>The assessment considered the potential for Licence Block 48/3 to be offered for licence to “an Operator” and for exploration drilling and seismic activity to take place within this licence (see paragraph 11.6.91, 11.6.103, 11.6.202, 11.6.213 of Volume 2, Chapter 11 (Doc ref No 7.2.11)).</p> <p>Category 3 by its definition is unknown activity for which the ES cannot make any assessment.</p>
<p>even if the Applicant’s ES assessment is adequate it fails to take account of EON’s proposed activities;</p>	<p>The ES can only assess what is known to the Applicant. The response above advises the detail provided to the</p>

	<p>applicant during the assessment. The new information provided in E.ON E&P's Written Representation (July 2015) is being discussed in the subsequent meetings that have been taking place in September, October and November 2015.</p> <p>The ES does suggest that E.ON E&P can drill outside the AfL at any time during its licence (paragraph 11.6.106 of Volume 2, Chapter 11). The ES also acknowledges that the magnitude of the spatial restriction on drilling in Block 48/3 is high (paragraph 11.6.106 of Volume 2, Chapter 11). It was the understanding of the Applicant however that drilling would be restricted to the Newton area as advised in consultation with E.ON E&P (letter from E.ON E&P dated July 2014). This information could not be made explicitly clear in the ES due to its confidential nature.</p> <p>The Applicant was aware that the operator applying for Block 48/3 would have been aware of the windfarm AfL and must therefore have taken this into consideration at time of application. The Applicant has, with the new information presented in E.ON E&P's written representation of July 2015, discussed with E.ON E&P the possibility of drilling within the AfL subject to necessary agreement between parties. The Applicant has made this clear in its written responses dated 15th July 2015 and 10th August 2015 (see Appendix CC of the Applicant's response to Deadline I and Appendix H of the Applicant's response to Deadline II).</p>
<p>the ES makes statements to the effect that EON have to proceed at their own risk, which are not acceptable to EON;</p>	<p>This statement is not made anywhere within the Volume 2, Chapter 11 Infrastructure and other users. The ES does state that any future operator of Block 48/3 will be aware of the AfL and will have taken coexistence into consideration (paragraph 11.6.97). This is a requirement of the licence application and is therefore a valid</p>

<p>seismic surveys are very hard to carry out within a built/under-construction wind farm;</p>	<p>assumption.</p> <p>The Applicant is aware that conventional towed streamer seismic surveys cannot proceed once a wind farm has been constructed. The applicant has assessed the ability of E.ON E&P to undertake seismic activity within Block 48/3 within a 30 month period prior to the construction of Subzone 2, considering a start date of offshore construction of Q1 2018 (Paragraph 11.6.91 of Volume 2, Chapter 11 of the ES). The ES also makes note that there are now technological solutions to undertaking seismic data acquisition within a wind farm. The ES is guided by information provided during stakeholder consultation. At a pre-application consultation meeting in May 2013, E.ON E&P advised the Applicant, in regard to the potential award of licence blocks in the 27th licensing round that overlap with Subzone 1 of the Hornsea Zone (Hornsea Project One) that seismic surveying was possible using Ocean Bottom Cable technology in that area (Table 11.3).</p>
<p>concerns about navigation, notwithstanding what is assessed in the ES.</p>	<p>The navigation risk assessment has been done by Anatec who are considered leading experts in this field. The NRA follows the requirements of MGN371 and has been consulted with and approved by the MCA. The Applicant has responded to the navigational issues raised by E.ON E&P previously (see Appendix CC of the Applicant's response to Deadline I and Appendix H of the Applicant's response to Deadline II).</p>