

**FAO Katherine Chapman**  
The Planning Inspectorate  
Temple Quay House  
Temple Quay  
Bristol  
BS1 6PN

9<sup>th</sup> December 2015  
**BY EMAIL ONLY**

Dear Katherine,

**Hornsea Two Offshore Wind Farm Order – Application Reference: EN010053 (“the Project”)**

We refer to the application for the development consent order (“DCO”) for the Project.

ConocoPhillips and the applicant promoting the Project (SMart Wind Limited, on behalf of Optimus Wind Limited and Breesea Limited (together “the Applicant”)) have been engaging in positive communications with collaborative discussions about the interface between the Project and ConocoPhillips’ interests and infrastructure.

These discussions have resulted in an agreed set of principles, which will form the basis of a commercial agreement between the parties to provide for the protection of ConocoPhillips’ interests and infrastructure in relation to the Radar Early Warning System (“REWS”). ConocoPhillips therefore agrees to withdraw its objection to the DCO subject to the inclusion of the following wording as a Requirement in the DCO:

*(1) No construction of any wind turbine generator forming part of the authorised development shall commence until the Secretary of State having consulted with the Operator is satisfied that appropriate mitigation will be implemented and maintained for the life of the authorised development.*

*(2) For the purposes of this requirement—*

*“appropriate mitigation” means measures to mitigate any adverse impacts which the operation of the authorised development will have on the ability of the Operator’s Radar Early Warning System to ensure the safety of its Saturn, Mimas and Tethys offshore platforms during the life of the authorised development;*

*“Operator” means ConocoPhillips (U.K.) Limited incorporated under the Companies Act (00524868) whose registered office is Portman House, 2 Portman Street, London, W1H 6DU.*

*“Radar Early Warning System means the radar early warning system used to monitor and track vessels proximate to the Operator’s offshore facilities via radio and network links. It comprises primarily of radars fitted on a number of Operator’s offshore platforms. It provides*

*a multi-site, multi-sensor integrated marine surveillance system with logistic and emergency response co-ordination facilities.*

*(3) The undertaker shall thereafter comply with all obligations contained within the appropriate mitigation for the life of the authorised development.*

– ConocoPhillips has made representations in addition to the Radar issue as outlined above. It is acknowledged that these issues can be dealt with between the parties as detailed below:

1. ConocoPhillips must be provided with technical information to be able to fully consider all possible implications and to ensure satisfactory mitigations are in place for the continued safety and integrity of ConocoPhillips' pipelines and infrastructure. Offshore locations and physical contact points of proposed cables crossing the CMS pipeline and piggy backed methanol line are required. Crossings of ConocoPhillips' pipelines should be kept to a minimum through bundling or other appropriate methods where possible. There should be no impediment to access to ConocoPhillips' facilities that may compromise or complicate decommissioning activity.
2. Potential crossing/proximity Issues - ConocoPhillips needs to be able to assess the proximity of wind farm construction and maintenance operations to infrastructure as well as any construction or maintenance vessels, to determine if any additional protection measures will be required.

Points 1 and 2 will be dealt with between the parties in a crossing and proximity agreement. ConocoPhillips acknowledges that the Applicants are under an obligation to enter into an offshore crossing and proximity agreement pursuant to their agreement for lease. The Applicants will enter into an agreement in order to ensure they are able to provide the Crown Estate with confirmation that ConocoPhillips has granted their consent before commencement of the authorised development.

3. The location and design of onshore cabling proximate to the ConocoPhillips onshore condensate line and any crossing points are of particular concern. The line is highly sensitive and ConocoPhillips routinely walk and fly the line to ensure it is protected. A detailed step-by-step plan with a schedule of all activities both during and post construction will be required, including specifics regarding plant, moving equipment and anything else that may impact the line. ConocoPhillips will also consider impacts of being unable to ship condensate and the potential of shutting in production.
4. There is additional concern surrounding electrical interference from HVAC current flows through proximate cabling. A minimum 50m proximity zone has been identified in order to ensure the safety of ConocoPhillips' pipelines both onshore and offshore. Additionally in relation to the onshore Condensate Line we require parametric analysis/modelling to quantify the influence on the impressed current cathodic protection system, the pipeline coating & pipeline steel. The study needs to include all sections of parallel (or near parallel) pipeline/cable runs, where cable proximity to pipeline is less than 500m, extending for 2km or more. Crossing points will also need to be assessed, but precise requirements are not clear at this time in the absence of any design details on the proposed crossings. A baseline survey will also be required following the study, with further surveys at regular intervals during the operating phase of the cable.

Points 3 and 4 are dealt with at Schedule L Part 10 of the draft DCO. The Protective Provisions for ConocoPhillips provide sufficient protection to ensure the above issues are addressed. It is once

again the intention of the parties to enter into an onshore crossing and proximity agreement in addition to the Protective Provisions prior to construction of the authorised development.

The execution of both onshore and offshore agreements is required to appropriately address all issues raised in this consultation including those outlined above. These agreements will also require to be reviewed and accepted by the other infrastructure owners, on behalf of whom ConocoPhillips operate.

Please note that concerns raised at this time are based on headline issues currently captured, and further concerns may be raised following review of technical detail as it becomes available.

Yours faithfully,

A solid black rectangular box used to redact the signature of Karen Morrison.

Karen Morrison

[For and on behalf of ConocoPhillips (U.K.) Limited]