

SUMMARY OF FULL WRITTEN REPRESENTATION ON BEHALF OF SPIRIT ENERGY NORTH SEA LIMITED, SPIRIT ENERGY RESOURCES LIMITED AND SPIRIT ENERGY NEDERLAND B.V.

1 Introduction

- 1.1 *'Spirit Energy'* is the trading name used by Spirit Energy Limited and its subsidiaries which collectively as a group conduct European oil and gas operations across the UK, Norway, the Netherlands and Denmark.
- 1.2 Spirit Energy North Sea Limited, Spirit Energy Resources Limited and Spirit Energy Nederland B.V. are each entities operating under the *'Spirit Energy'* trading name, with assets and operations located in the Southern North Sea.
- 1.3 On account of the similar impacts of the Project on all three Spirit entities, the full written representation (and this summary) is prepared jointly on their behalf.
- 1.4 Spirit has interests that lie within or near to the Development Site for the proposed Project.
- 1.5 A detailed description of these assets (referred to as the Affected Assets) and their locations relative to the Development Site is set out in section 2 of the full written representation.
- 1.6 While Spirit does not object to the principle of the Application, the Application is likely to impact adversely on Spirit's ability to carry out operations in and around its existing assets in a safe, efficient and cost-effective manner, with specific reference to:
 - 1.6.1 shipping and marine activity, and
 - 1.6.2 aviation activity.

2 Shipping and marine activity

- 2.1 The key shipping and marine impacts of the Project on Spirit's Affected Assets and licenced blocks relate to: the constraints that would be placed upon vessels required to deliver supplies and undertake work in support of Spirit's operations; increased collision risk from third party vessels; increased routine costs of operating and maintaining facilities due to longer vessel journeys; significant cost and effort in additional updates to installation safety cases to account for changes necessitated by the proximity of the Project; and restrictions leading to delays and increased costs for carrying out diving operations during windfarm construction.
- 2.2 Spirit commissioned a technical review of the Application and Environmental Statement in so far as it relates to shipping and navigation impacts relevant to Spirit. This review carried out by DNV Noble Denton marine services by way of a gap analysis identified hazards which had not been assessed or had not been adequately assessed in order to inform consideration and determination of the Application. It also considered more generally the hazards which would affect Spirit in consequence of the Project in the context of the oil and gas regulatory regime.

2.3 This review is submitted as a supporting document and its key findings are set out in section 5.2 of the full written representation.

2.4 In turn, the impacts of these findings on Spirit's assets and operations are outlined in section 5.9 of the full written representation.

3 Aviation activity

3.1 The key aviation impacts of the Project on Spirit's Affected Assets and licenced blocks relate to: the constraints that would be placed upon helicopters required to transport people and materials to and from platforms and vessels servicing Spirit's operations due to the minimum separation distances from wind farm infrastructure required to execute safe airborne radar approaches and to reach minimum safe altitudes over the turbines in certain flying and meteorological conditions.

3.2 Spirit commissioned AviateQ to prepare a technical report assessing the aviation impacts on the Affected Assets and its operations.

3.3 This report is submitted as a supporting document and its key findings are set out in section 6.2 of the full written representation.

3.4 In turn, the impacts of these findings on Spirit's assets and operations are outlined in section 6.7 of the full written representation.

4 Licence activities

4.1 The Application also has the potential to prejudice future exploration and exploitation of oil and gas resources from Spirit's current licences contrary to its obligations to maximise economic recovery of UK hydrocarbon resources.

5 Conclusion

5.1 Accordingly, the Application does not accord with relevant national policy in that it does not –

5.1.1 Provide for the appropriate co-existence of Spirit's oil and gas operations (current and future) with the Project;

5.1.2 Seek to minimise negative impacts and reduce risks to as low as reasonably practicable in respect of Spirit's operations and assets, as is required by the health and safety regulatory regime within which Spirit operates; or

5.1.3 Avoid or minimise disruption, economic loss or adverse effects on safety in so far as Spirit's interest are concerned, particularly in the context of Spirit's obligation to secure the maximum value of economically recoverable petroleum.

5.2 Furthermore the Application is not consistent with the Oil and Gas Authority's strategy for achieving the principle objective of maximising economic recovery of United Kingdom petroleum.

- 5.3 Spirit's analysis of relevant national policy (both planning and specific to the oil and gas industry) is set out in section 3 of the full written representation.
- 5.4 **Protective Provisions**
- 5.5 Given the likely impacts of the Project on Spirit's assets and operations, a number of protective provisions are sought to be incorporated into the DCO if granted.
- 5.6 Spirit's proposed protective provisions and Spirit's justification for requesting their incorporation are set out in the annex to their full written representation. These include: the establishment of a 7.5nm exclusion zone with no turbines around each of Spirit's platforms, subsea wells, and two potential future subsea well locations; the establishment of a 2nm exclusion zone with no infrastructure around each of Spirit's platforms, subsea wells, and two potential future subsea well locations; the provision of appropriate radar early warning systems and various procedures to ensure collaborative working.