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Our ref KANX/EDN/178270.00001

11 February 2022

Dear Recipient

**Hornsea Project Four Offshore Wind Farm DCO (the “Proposed Development”)
NEO Energy (SNS) Limited (“NEO”)**

We act on behalf of NEO Energy (SNS) Limited (Company Number SC291165 and having its registered office at The Silver Fin Building (9th Floor), 455 Union Street, Aberdeen, United Kingdom, AB11 6DB). Relevant representations were submitted on behalf of NEO in respect of the Proposed Development on 15 December 2021.

On behalf of NEO, we would make the following written submissions on the Examination procedure and draft Examination Timetable:

1. Annex E does not require Statements of Common Ground to be entered into between the Applicant and any offshore oil & gas undertakers who have submitted representations in respect of the Proposed Development (including NEO, Bridge Petroleum Limited, Perenco UK Limited and Harbour Energy).¹

In light of the concerns raised by NEO, and those raised by other oil & gas undertakers, our view is that Statements of Common Ground to be prepared between the Applicant and oil & gas undertakers would assist the Examining Authority during its examination of the Proposed Development by providing a clear statement of factors which are agreed and those which are outstanding between the parties. Our view is that this will ultimately save time during the

¹ We note that in respect of Examinations for other projects by this Applicant, the Examining Authority did request Statements of Common Ground from oil & gas undertakers that had submitted relevant representations, e.g. Hornsea Three (EN010080).

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examination and will assist the Examining Authority by adding focus on the key issues between the parties. As such, we request that Statements of Common Ground to be entered into between the Applicant and offshore oil & gas undertakers who have submitted representations in respect of the Proposed Development (or alternatively, just between the Applicant and our client) be added to Annex E. .

2. Our client considers that the impacts of the Proposed Development on their operations (e.g. navigation, aviation safety, etc.) are of a suitably complex and technical nature, and echo concerns raised by other oil & gas undertakers. Our provisional view is that such issues would benefit from issue specific hearings. We note that only one issue specific hearing is included in the draft Examination Timetable (relating to the draft DCO), and our client considers that issue specific hearings on impacts to navigation, infrastructure and other offshore operations would be helpful in allowing the Examining Authority to fully consider the Proposed Development.

We note that Interested Parties are not required to confirm participation in issue specific hearings until Deadline 1 and we will provide a confirmation regarding our client's wish to participate by that date. However, at this stage, our client is of the view that protective provisions in respect of its assets should be included within the draft DCO and our client is likely to wish to participate in the issue specific hearing which is currently scheduled for 12 April 2022 on that basis.

We do not consider that these submissions require to be heard orally at the Preliminary Meeting and, as such, would not intend to attend the Preliminary Meeting unless the Examining Authority considers our presence to be required.

If you require any further information in relation to this representation, please contact our Kathryn Nolin

████████████████████
Yours faithfully

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CMS Cameron McKenna Nabarro Olswang LLP