



Sheringham and Dudgeon (Windfarm) Extension Projects

Perenco UK Limited Summary of Written Representation

Perenco UK Limited (PUK) has prepared a Written Representation (titled: *Sheringham and Dudgeon (Windfarm) Extension Projects, Perenco UK Limited Response to Examiner Deadline 1*) for Deadline 1 of the Examination of the Development Consent Order (DCO) application for the Sheringham and Dudgeon Extension Projects.

The following provides a concise summary of the key points of the Written Representation:

1. The Waveney normally unattended installation (NUI) is located 500m from the northern edge of the northern Dudgeon Extension Project (DEP North).
2. The Durango subsea well (no longer producing) is located to the south-west of DEP North.
3. A subsea gas pipeline runs from the Durango well through the proposed windfarm to the Waveney NUI.
4. Production operations at the Waveney NUI require weekly support from helicopters.
5. Decommissioning of the Waveney NUI as well as the Waveney and Durango wells (currently expected to occur after 2030) will require the deployment of a non-production installation (NPI) and possibly also a heavy lift vessel (HLV).
6. During the 3-6 months an NPI would be deployed for decommissioning, twice-daily helicopter flights would be required to the NPI.
7. During the 4-6 weeks that an HLV or an NPI is deployed for dismantling, daily helicopter flights would be required to the HLV or NPI.
8. PUK has assessed the impact of the proposed windfarm on helicopter and marine operations and also on telecommunications.
9. PUK believes that the Applicant, based on the *Helicopter Access Study* (APP-205) conducted by Anatec Ltd (Anatec), has significantly understated the impact of the proposed DEP North on helicopter operations in support of Waveney and Durango operations.
10. The main difference in view arises from Anatec assuming that flights can be made whenever CAA minimum conditions are satisfied. In fact, North Sea Helicopter Operators impose more onerous conditions for flying in proximity to wind turbines. These conditions are expected to soon be incorporated into CAA policy and guidance.
11. The Applicant's proposal to place wind turbine generators 1nm from the Waveney NUI would preclude production of gas from the Waveney field and prevent the Waveney NUI from being decommissioned and dismantled. PUK would thus be prevented from fulfilling its statutory obligations under the production licences already awarded to it.
12. PUK assesses that an obstacle-free radius of 1.5nm around the Waveney NUI would permit some helicopter operations but that this would result in severe restrictions relative to the current situation and thus have a very significant detrimental impact on PUK's Waveney and Durango operations.
13. PUK believes that a 3nm radius obstacle free airspace around the Waveney NUI would be necessary for successful co-existence. This is based on the distance to a wind



- turbine generator at which Helicopter Operators impose more stringent criteria for flying.
14. As long as the 3nm radius referred to at 13 (or even the 1.5nm radius referred to at 12) is also free from temporary and permanent surface infrastructure, PUK is confident that there would be adequate space for its marine operations at the Waveney NUI.
 15. A 1km wide corridor (500m either side of the pipeline) free from surface obstructions would also be required along the line of the Durango to Waveney pipeline to permit vessel access.
 16. PUK is satisfied that there should be no detrimental impact from DEP North on line of sight telecommunications links with the Waveney NUI.
 17. PUK and the Applicant are in discussion to try to agree arrangements that will enable coexistence and cooperation.
 18. Should agreement not be reached, PUK will require Protective Provisions to be imposed on the Applicant that provide for:
 - obstacle-free airspace of at least 3nm around the Waveney platform
 - a corridor of at least 1km width along the route of the Durango to Waveney pipeline which is clear of temporary and permanent surface obstacles.
 19. PUK has been advised that all North Sea Helicopter Operators are currently in discussions with the CAA and are developing a set of consistent standards for flying 'in proximity to' and 'within' windfarms. This is likely to lead to a revision of CAP764 *Policy and Guidelines on Wind Turbines* and the CAA's *Specific Approval for Helicopter Offshore Operations* (SPA.HOFA). PUK believes that any decision regarding the DEP North DCO should be made in the light of such updated policy and guidance from the CAA.