

BHP Billiton Petroleum Great Britian Limited
Dogger Bank South Offshore Wind Farms
Written Representation

1. INTRODUCTION

- 1.1 BHP Billiton Petroleum Great Britian Limited (**BHP**) made a relevant representation to the Dogger Bank South Offshore Wind Farms (the **Project**) examination on 5 September 2024. This relevant representation was made to register BHP's interest in the application in respect of this potential interface between decommissioned infrastructure for which BHP is responsible and the proposed wind farm area.
- 1.2 Within its relevant representation, BHP noted that it would welcome engagement with RWE Renewables UK Dogger Bank South (West) Ltd and RWE Renewables UK Dogger Bank South (East) Ltd (the **Applicant**) to understand the potential interface and discuss any necessary mitigation that may be required. BHP has received no engagement from the Applicant following its relevant representation and so is still unclear on how the interface would be managed/any impacts avoided to the infrastructure BHP manage within the proposed wind farm area.

2. BHP INFRASTRUCTURE

- 2.1 As noted in its relevant representation, BHP had a majority interest in the Esmond, Forbes and Gordon gas fields in the southern North Sea prior to its decommissioning and retains ongoing responsibilities in respect of the decommissioned infrastructure, including a decommissioned pipeline (PL264, PL258, PL261, and PL255), which was left in place and overlaps with the proposed wind farm area. The decommissioned pipeline was surveyed in 2020 and is expected to again be surveyed in 2030.

3. REQUEST FOR ENGAGEMENT

- 3.1 In their response to BHP's relevant representation, dated October 2024, the Applicant acknowledges the comments made and states that it "*will engage with BHP to discuss concerns raised within their representation*".
- 3.2 BHP has received no engagement from the Applicant following its relevant representation.
- 3.3 BHP request engagement from the Applicant to confirm how the DCO secures protections for its infrastructure located within the proposed wind farm area.
- 3.4 In the absence of such confirmation as to how the interface would be managed or any impacts avoided to the decommissioned infrastructure, including pipeline (PL264, PL258, PL261, and PL255), BHP maintains its representations in relation to the Project and reserves the right to make further representations, including in respect of any necessary protections to be imposed in the draft DCO to safeguard BHP's interests. It is, however, hoped this will not be necessary if engagement and clarification from the Applicant is forthcoming.