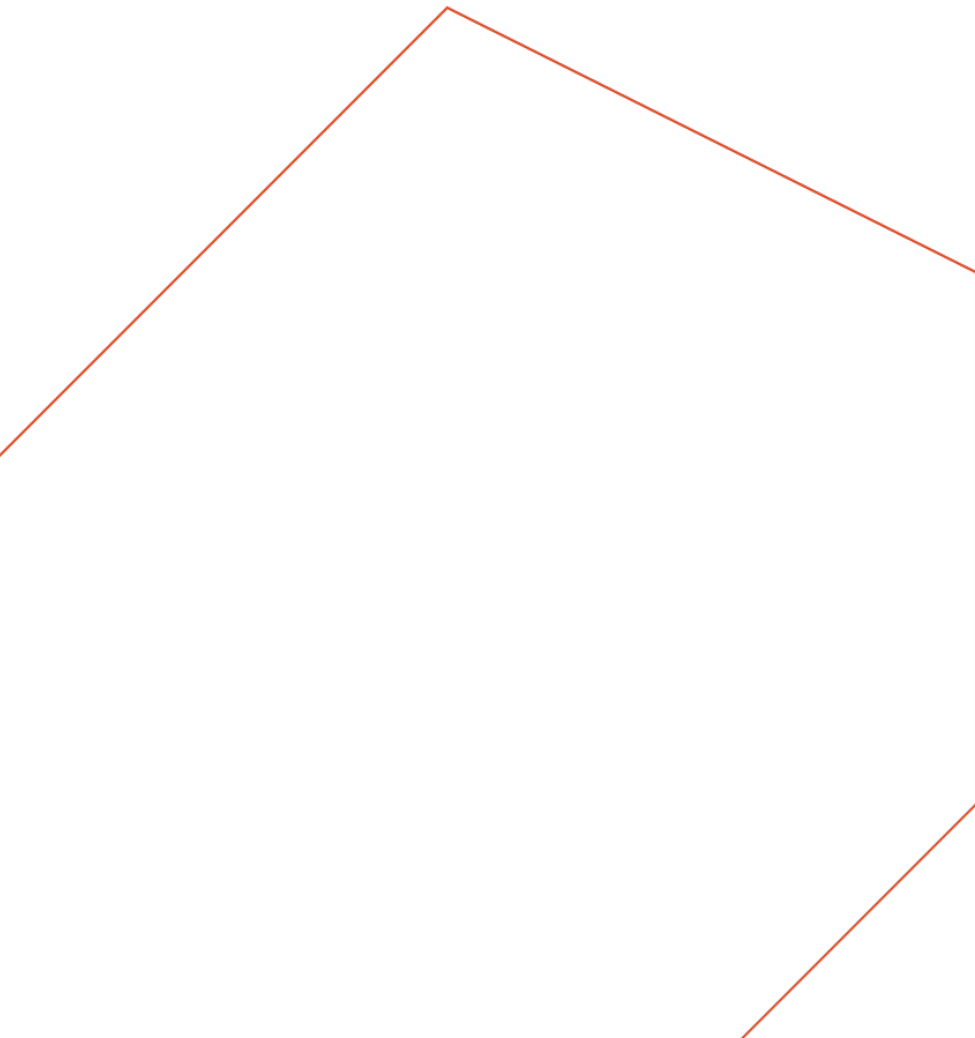




Morgan Generation Assets

Written Representation Summary



The proposed Morgan Generation Assets are located adjacent to the Millom West Platform and the Millom East subsea facilities, each forming part of the Millom Field owned and operated by Chrysaor Resources (Irish Sea) Limited referred to herein as “Harbour Energy” (See Figure 1). The Millom Field has ceased production, however decommissioning activities are likely to overlap with the construction, and possibly also the operation, of the proposed Morgan Generation Assets.

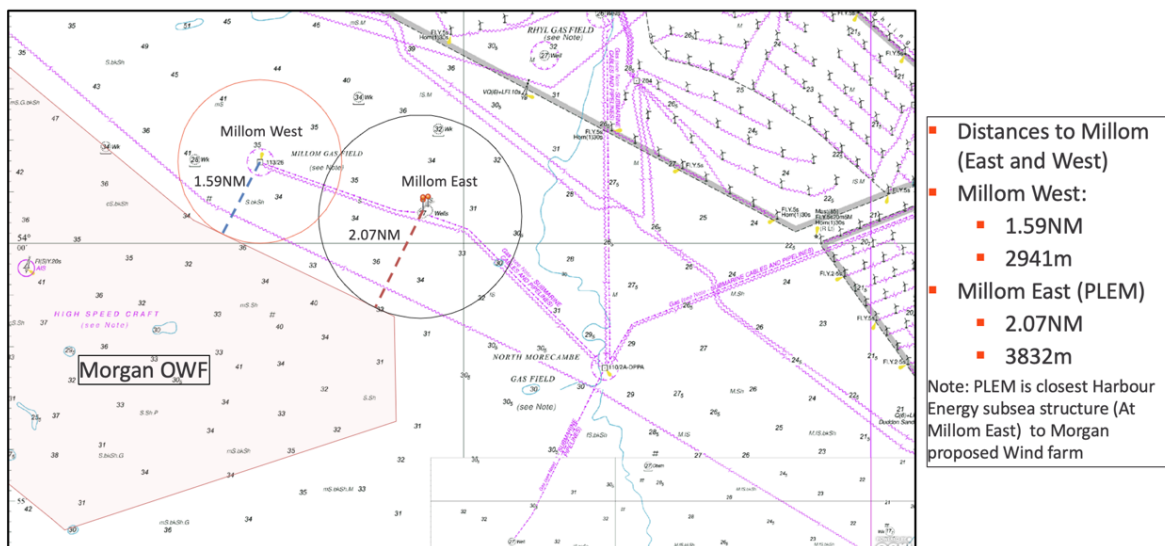


Figure 1: Location of Morgan Generation Assets Relative to the Millom Field

Harbour Energy’s Written Representation highlights that:

- Harbour Energy anticipates the need for continued aviation access until 2030 at Millom West and to approximately 2032 at Millom East.
- The proposed proximity of wind turbines will restrict aviation (helicopter) access to non-producing installations (“NPI”s) stationed to work at the Millom West Platform and the Millom East subsea facilities.
- Harbour Energy’s production and decommissioning activities are obligations under the licence(s) granted by the Secretary of State.
- Harbour Energy is committed to finding solutions that will allow the co-existence of its operations with other stakeholders, including the Applicant.
- The National Energy Policy Statement for Renewable Energy Infrastructure (EN-3) expects the Secretary of State to be “satisfied that the site selection and site design of a proposed offshore wind farm and offshore transmission has been made with a view to avoiding or minimising disruption or economic loss or any adverse effect on safety to other offshore industries.” (EN-3: 2.8.345).
- As currently proposed, the Morgan Generation Assets would have the potential to result in significant disruption and economic loss to Harbour Energy’s remaining decommissioning activities at the Millom Field. There would also be an adverse effect on safety arising from the restrictions that would apply to aviation operations due to the proposed proximity of Morgan Generation Assets.
- It is anticipated that Millom Field decommissioning will be disrupted to the extent that an annual average of ten percent (10%) (rising to sixteen percent (16%) in winter) of currently available flying opportunities to an NPI at Millom East would be lost.
- An estimate of Harbour’s economic loss based on the average extension of the Millom East subsea facilities decommissioning programme would be in excess of ten million GBP (£10,000,000) (excluding any further economic impact of safety mitigations). This loss would be increased if work had to be undertaken largely in winter.

- A potential mitigation against disruption and economic loss would be for protective provisions to be included in the DCO that ensure that no wind turbines would be constructed with any part of such wind turbine closer than three (3) nautical miles to the Millom East PLEM. This would reduce disruption, however the economic loss would still be in excess of four million GBP (£4,000,000) (excluding any further economic impact of safety mitigations). Compensation could also be considered but would be inefficient when considered on a post-tax basis.
- Harbour Energy has not yet undertaken a study to satisfy itself that collision avoidance systems would be adequate following construction of the Morgan Generation Assets. Harbour Energy is however concerned that shipping passing around the southern tip of the Morgan Generation Assets and then turning north or north-west may not be easily visible on an NPI's marine radar and there may thus be limited early warning of a potential collision. For a vessel steaming towards an NPI at around twenty (20) knots, the effect of the Morgan Generation Assets may be to reduce the early warning available to the NPI to as little as five (5) or ten (10) minutes resulting in disruption, economic loss and a potential adverse effect on safety.
- Poor planning and coordination between the Applicant and Harbour Energy in connection with mutually exclusive simultaneous operations would result in disruption to execution of work, corresponding economic loss and an adverse effect on safety with risk to personnel.
- Harbour Energy believes that a condition of the Application being granted should be that an agreement (a Co-operation and Co-existence Agreement) is in place between Harbour Energy and the Applicant setting out the mechanisms for coordinating such mutually exclusive activities.
- As set out in Harbour Energy's response to the PEIR, the Millom West platform and Millom East subsea facilities will require marine access corridors free from temporary or permanent surface infrastructure (except as may from time to time be approved by the Millom Operator) as follows:
 - a radius of one point eight (1.8) kilometres (1 nautical mile) around the Millom West platform;
 - a one point eight (1.8) kilometres (1 nautical mile) corridor between the Millom West and DPPA platforms; and
 - Five hundred (500) metres each side of the Millom West and Millom East pipelines and subsea cables.
- Harbour Energy believes that a condition of granting the Morgan Generation Assets DCO should be a requirement that an agreement (a Cooperation and Co-existence Agreement) is in place between the Applicant and Harbour Energy that ensures that the parties will work together to enable one another's work.