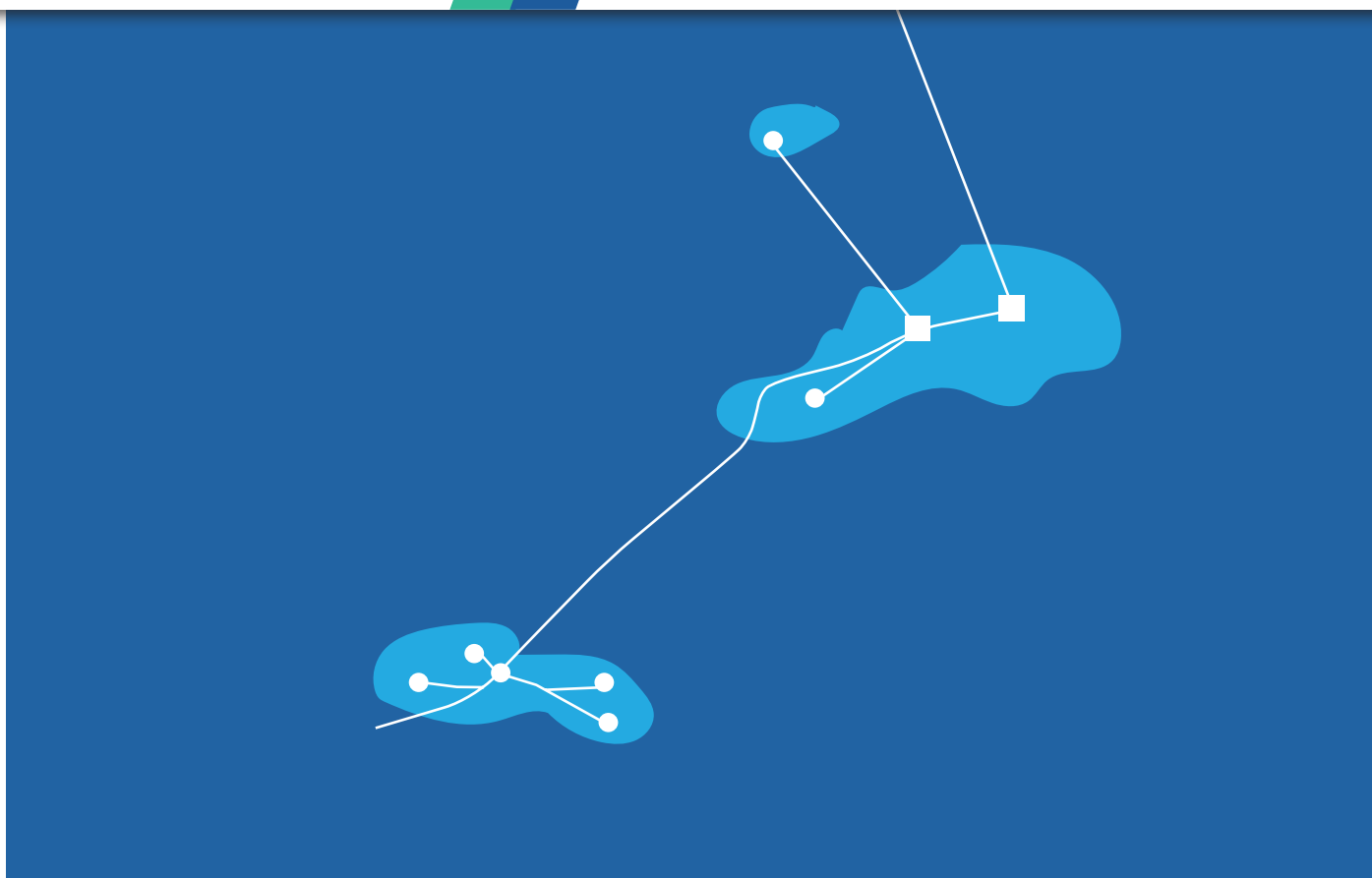
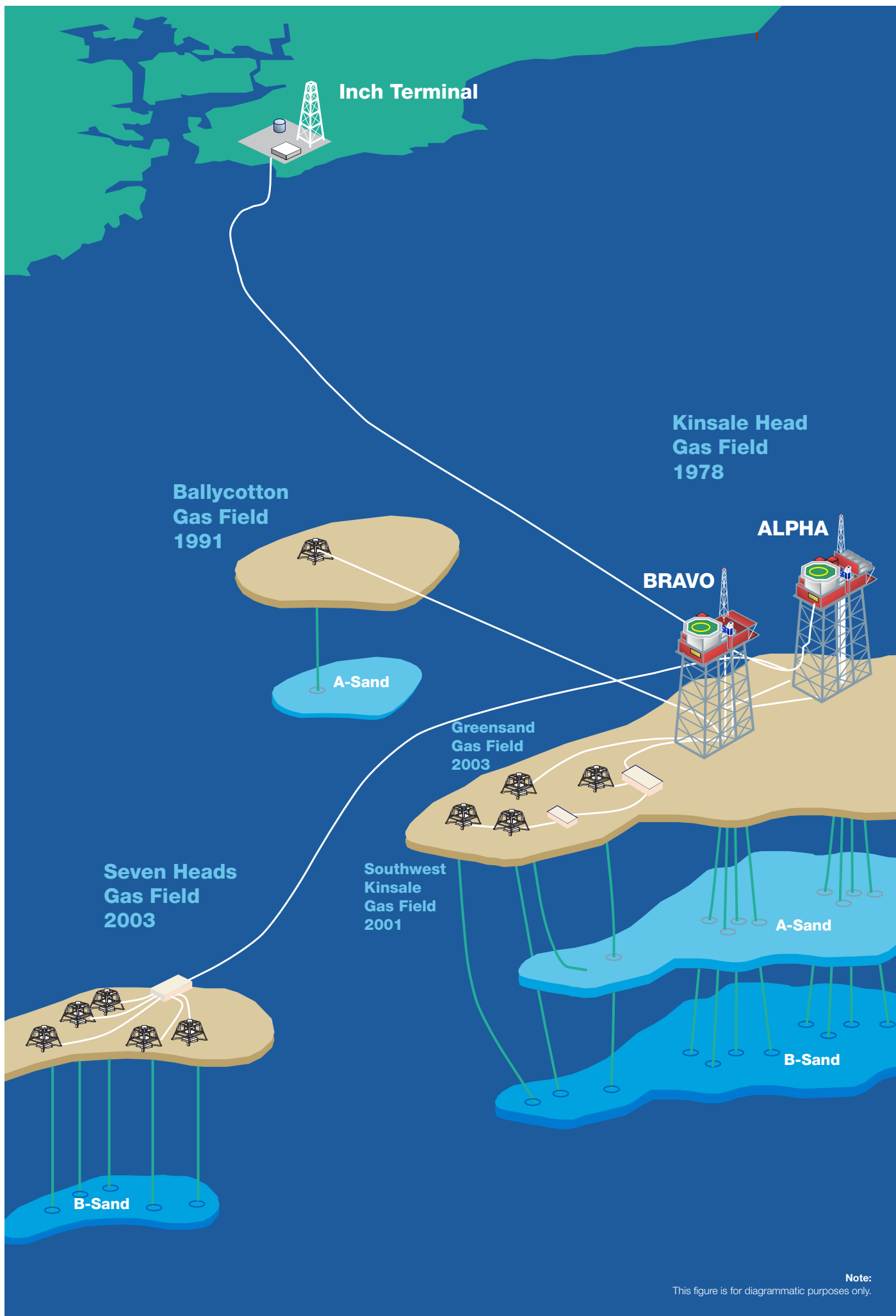




Kinsale Area Decommissioning Project
**Decommissioning Plan -
Seven Heads Petroleum Lease -
Consent Application No.1**





Contents

	Page
Glossary of Terms	i
1 Introduction	4
1.1 Introduction	4
1.2 Consent Application No.1 – Seven Heads	4
1.3 Seven Heads Petroleum Lease	8
1.4 Overview of Facilities	8
1.5 Overview of Statutory Background	10
1.6 Methodology	12
1.7 Overview of Decommissioning Plan	13
1.8 Objective of Decommissioning project	14
2 Facilities Description	15
2.1 History of Operations	15
2.2 Inventory of Facilities	16
3 Cessation of Production	21
3.1 Reasoning	21
3.2 Technical and Economic Evaluations	21
3.3 Other Uses Considered for the Facilities	23
4 Decommissioning Options	24
4.1 Subsea Wells	24
4.2 Subsea Structures	24
5 Decommissioning Project Management	25
5.1 Project Management Approach	25
5.2 Organisation	25
5.3 Resources	26
5.4 Costs	27
5.5 Reporting	27
6 Decommissioning Activities and Schedule	28
6.1 Pre-Cessation of Production Activities	28
6.2 Post CoP Activities/Pre-Decommissioning Activities	28
6.3 Decommissioning Activities	29
6.4 Decommissioning Schedule	31
6.5 Materials and Waste Management	33
6.6 Health and Safety	35
7 Post-Decommissioning Phase	37
7.1 Post Decommissioning Status	37

7.2	Post Decommissioning Survey	37
7.3	Decommissioning Close-out Report	37
7.4	Residual Liability	37
7.5	Post Decommissioning Monitoring	37
8	Environmental Assessment	38
8.1	Environmental Baseline and Sensitivity	38
8.2	Environmental Assessment Methodology and Identification of Potentially Significant Effects	38
8.3	Management of Residual Effects and Conclusions	41
8.4	Conclusions of the Appropriate Assessment Screening	43
9	Stakeholder Engagement	44
9.1	Introduction	44
9.2	Stakeholder Engagement Activities	44
9.3	Further Stakeholder Engagement	45

Tables

Table 1: Well Details.....	5
Table 2: Lease details.....	8
Table 3: Key National, European and International legislation relevant to the KADP	11
Table 4: Summary of proposed decommissioning options for the Seven Heads Facilities (Consent Application No.1).....	13
Table 5: Summary of Development History for the Kinsale Area Fields	15
Table 6: Seven Heads wells to be decommissioned	20
Table 7: Subsea infrastructure to be decommissioned	20
Table 8: Subsea well abandonment main steps	29
Table 9: Materials Generated	33
Table 10: Summary of potential significant environmental effects	39
Table 11: Summary of commitments and actions.....	41

Figures

Figure 1: Location of the Kinsale Area fields and facilities.....	7
Figure 2: Kinsale Area Facilities	9
Figure 3: Subsea X-mas Tree.....	17
Figure 4: Typical Well Abandonment Diagram	18
Figure 5: Seven Heads Facilities	19
Figure 6: Seven Heads Manifold	20
Figure 7: Seven Heads gas field – production rates	22
Figure 8: PETRONAS Project Management System for decommissioning projects.....	25
Figure 9: Project Team – Execution Phase	26
Figure 10: Typical semi-submersible drilling rig (MODU).....	30

Figure 11: Indicative Project Schedule	32
--	----

Appendices

Appendix A

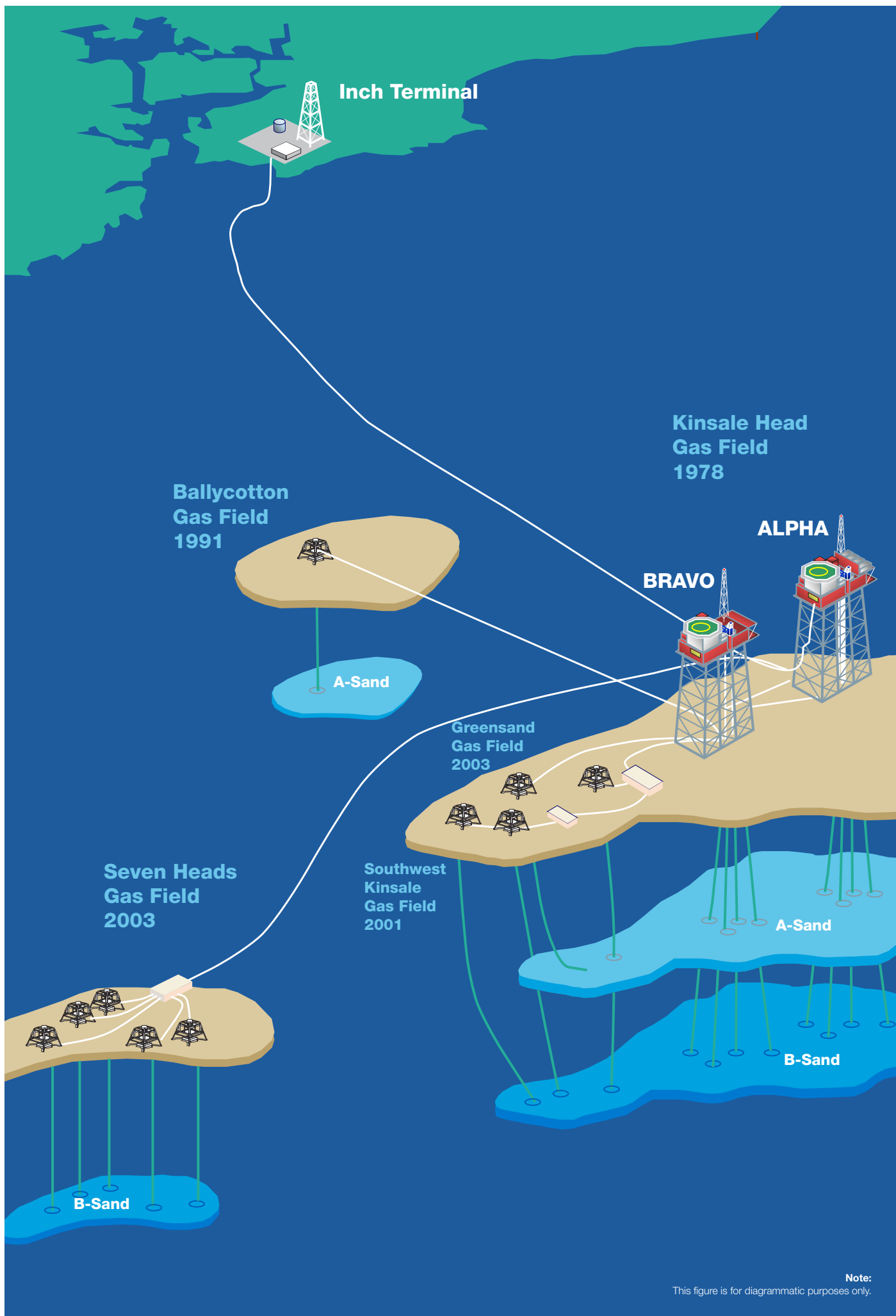
Further Information

Appendix A1: Relevant International Conventions and European Legislation

Appendix A2: Well Completion Diagrams

Appendix A3: Layout Drawings

Glossary of Terms



Glossary of Terms

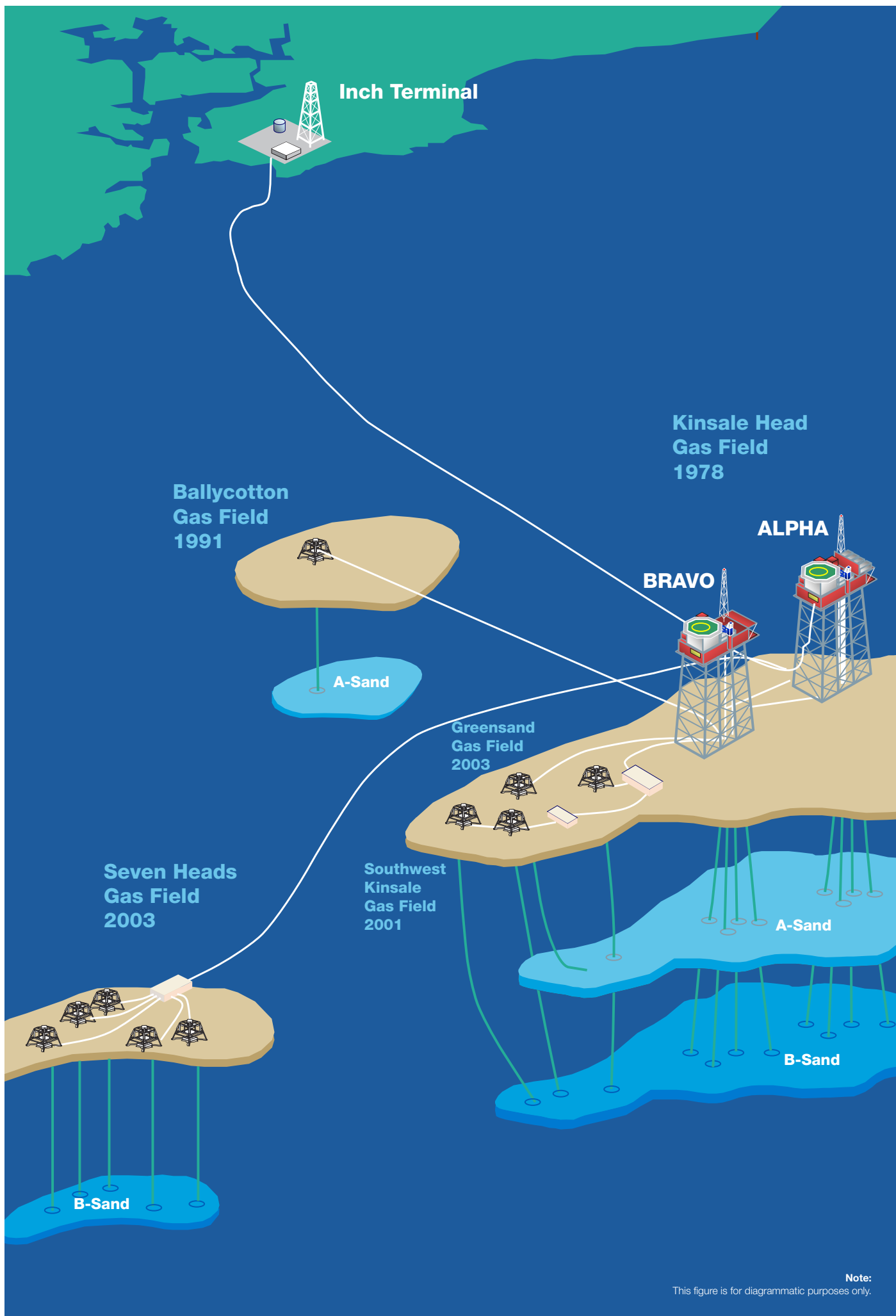
Term	Explanation
AA	Appropriate Assessment
ALARP	As Low As Reasonably Practicable
AHV	Anchor Handling Vessel
Buoyancy tank	An enclosed air-filled section of a boat or ship designed to keep it afloat and prevent it from sinking
Bunkering	Supply of fuel for use by ships in a seaport
CA	Comparative Assessment
Cantilever	Structural element anchored at only one end to a support from which it is protruding
CCS	Carbon Capture and Storage
Concrete mattress	A series of concrete blocks usually connected by polypropylene ropes resembling a rectangular mattress, used for the weighting and/or protection of seabed structures including pipelines
CoP	Cessation of Production: the stage at which, after all economic development opportunities have been pursued, hydrocarbon production ceases.
CRU	Commission for Regulation of Utilities
CSV	Construction Support Vessel
DAA	Dublin Airport Authority
DCCAE	Department of Communications, Climate Action and Environment
DCENR	Department of Communications, Energy and Natural Resources
DECC	Department of Energy & Climate Change (UK)
Decommissioning	Planned shut-down or removal of a building, equipment, plant, offshore installation etc., from operation or usage offshore.
Diesel	A low viscosity distillate fuel
DSV	Diving Support Vessel
DTTAS	Department of Transport, Tourism and Sport
ER	Environmental Report
EIA	Environmental Impact Assessment
EPA	Environmental Protection Agency
FEAS	Marine Institute's Fisheries Ecosystems Advisory Services
Flowline	Pipeline carrying unprocessed oil/gas within the oil or gas field area
Freespan	A free span on a pipeline is where the seabed sediments have been eroded, or scoured away leaving a void under the pipeline so that the pipeline is no longer supported on the seabed
Grout	Particularly fluid form of concrete used to fill gaps, generally a mixture of water, cement, and sand
HES	Health, Environment and Safety
HWM	High Water Mark
HLV	Heavy-Lift Vessel

Term	Explanation
IMO	International Maritime Organisation
<i>In situ</i>	In the original place.
Interconnector	Structure which enables energy to flow between networks, refers to international connections between electricity and natural gas networks
IOSEA	Irish Offshore Strategic Environmental Assessment
IWDG	Irish Whale and Dolphin Group
Jacket	The structure comprising the “legs” of the offshore platform connected together by horizontal and diagonal trusses and usually made of welded tubular steel. The jacket is typically secured to the seabed by piles
KA	Kinsale Alpha platform
KADP	Kinsale Area Decommissioning Project
KB	Kinsale Bravo platform
KPIs	Key Performance Indicators
km	Kilometre: 1,000m, equivalent to 0.54 nautical miles
LPP	Layer Polypropylene
Manifold	A pipe or chamber branching into several openings.
MARPOL	The International Convention for the Prevention of Pollution from Ships
MRCC	Marine Rescue Co-ordination Centres
Natura 2000 sites	Natura 2000 is a network of nature protection areas in the territory of the European Union. It is made up of Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) designated respectively under the Habitats Directive and Birds Directive.
NIS	Natura Impact Statement
nm	Nautical Mile (1852m = 1 minute of latitude = 1/60 degree of latitude)
NPWS	National Parks and Wildlife Service
NUI	Normally Unmanned Installation: an installation with minimal facilities which is not permanently crewed and is controlled from a remote location (e.g. other platform or shore)
OGUK	Oil & Gas UK
OSPAR	Oslo and Paris Convention
P&A	Plug and Abandon (wells)
PAD	Petroleum Affairs Division of the Department of Communications, Climate Action and Environment
PEP	Project Execution Plan
PETRONAS	Petroliaam Nasional Berhad
PLEM	Pipeline End Manifold
PSV	Platform Supply Vessel
PUDAC	Permit to Use or Discharge Added Chemicals
ROV	Remotely Operated Vehicle: a small, unmanned submersible used for inspection and the carrying out of some activities such as valve manipulation
SAC	Special Area of Conservation: established under the Habitats Directive

Term	Explanation
Seafastening	Action of fastening/securing cargoes on ship with the aim of preventing them from movement while the ship is in transit
Semi-submersible rig	A floating mobile drilling rig supported on a number of pontoons, and typically anchored to the seabed while on station
SFPA	Sea Fisheries Protection Authority
Shears	Cutting instrument in which two blades move past each other
SPA	Special Protection Area: established under the Birds Directive
Subsea manifold	Large metal piece of equipment made up of pipes and valves, designed to transfer oil or gas
SWK	South West Kinsale
Tie-backs	Link between a satellite field and an existing production facility
Topsides	The collective name for the many drilling, processing, accommodation and other modules which when connected together make up the upper section of the platform which rests on the jacket
Umbilical	Cable and/or hose which supplies required electrical power and chemicals for subsea well control
WDC	Western Drill Centre
Wet Gas	Any gas with a small amount of liquid present

Section 1

Introduction



1 Introduction

1.1 Introduction

PSE Kinsale Energy Limited (Kinsale Energy) is preparing for the decommissioning of the Kinsale Area gas fields and facilities, which are coming to the end of their productive life, having been in production since 1978. The Kinsale Area gas fields and facilities are made up of (1) the Kinsale Head gas fields and facilities and (2) the Seven Heads gas field and facilities. Together the decommissioning of the entirety of the Kinsale Area gas fields and facilities is collectively referred to as the Kinsale Area Decommissioning Project (KADP). The Kinsale Area gas fields and facilities are located in the Celtic Sea, between approximately 40 and 70km off the County Cork coast and onshore at Inch, Co. Cork (**Figure 1**).

The within application relates to the decommissioning of certain facilities associated with the Seven Heads gas field and facilities.

1.2 Consent Application No.1 – Seven Heads

Pursuant to section 13 of the Petroleum and Other Minerals Development Act 1960 as amended (1960 Act), a petroleum lease was granted in respect of the Seven Heads gas field and facilities in November 2002 (Seven Heads Petroleum Lease). The Seven Heads Field Plan of Development (Seven Heads Plan of Development) was submitted and agreed with the then Minister in respect of the Seven Heads gas field and facilities in accordance with the terms of the Seven Heads Petroleum Lease.

1. Application for approval of an addendum to Seven Heads Field Plan of Development under Section 13 of the 1960 Act

The Seven Heads gas field is coming to the end of its productive life and PSE Seven Heads Limited¹ is applying to the Minister for Communications, Climate Action and the Environment (the “Minister”) for approval for an addendum to the Seven Heads Plan of Development for the decommissioning of certain facilities as set out in this document. PSE Seven Heads Limited has prepared this Decommissioning Plan - Seven Heads Petroleum Lease Consent Application No.1 (the “**Decommissioning Plan**”) which sets out the details for the decommissioning² of certain facilities in the Seven Heads gas field.

In accordance with section 13A of the 1960 Act, an Environmental Impact Assessment Report (EIAR) has been prepared to accompany this application. An Appropriate Assessment (AA) Screening Report has also been prepared to accompany this application.

2. Application for Consent under Section 5 of the Continental Shelf Act 1968 (as amended)

Pursuant to Section 5(2) of the Continental Shelf Act 1968, as amended, the consent of the Minister is also sought by PSE Seven Heads Limited to alter and remove certain facilities from the area designated pursuant to Article 2 of the Continental Shelf Designated Areas Order 1993 SI 92 of 1993.

¹ PSE Seven Heads Limited is a wholly owned subsidiary of PSE Kinsale Energy Limited. Where appropriate, references to Kinsale Energy in this document and the associated EIAR and AA Screening Report shall include PSE Seven Heads Limited.

² Meaning the removal, part removal or leaving in place of any installation or facility.

1.2.1 KADP – Consent Application Process

A further consent application to decommission the remainder of the Seven Heads gas field and facilities will be submitted in due course as part of the overall KADP. In addition, consent applications seeking approval for the decommissioning of facilities in the Kinsale Head gas fields and facilities will be submitted in respect of the Kinsale Head gas fields and facilities. An Application for consent to decommission certain facilities in the Kinsale Head gas fields will be submitted in or around the same time as this Decommissioning Plan. The facilities to be decommissioned under the various consent applications for the KADP are set out below:

Seven Heads Petroleum Lease – Consent Application No.1 (this Decommissioning Plan)

- Five Seven Heads Field subsea development wells including the wellhead structures, i.e.:
 - Well 48/24 - 5A
 - Well 48/24 - 6
 - Well 48/24 – 7A
 - Well 48/24 - 8
 - Well 48/24 – 9
- One previously abandoned exploration well:
 - Well 48/23-3 (Wellhead Removal only)
- All infield subsea infrastructure associated with the Seven Heads gas field, including the subsea manifold, pipeline/umbilical terminations and associated protection materials.

Kinsale Head Petroleum Lease (OPL 1) – Consent Application No.1

- The Kinsale Alpha (KA) and Kinsale Bravo (KB) topsides,
- All infield subsea infrastructure associated with the OPL-1, including the subsea manifold, PLEMs, valve skid, intermediary tee skid, pipeline/umbilical terminations and associated protection materials.
- All OPL-1 subsea and platform wells including the wellhead structures, as detailed in **Table 1**.
- 3 previously abandoned exploration wells

Table 1: Well Details

Well no.	Location/associated development	Present status
Platform Wells		
49/16-A1	Kinsale Head (KA)	Gas Producer
49/16-A3	Kinsale Head (KA)	Gas Producer
49/16-A4	Kinsale Head (KA)	Gas Producer
49/16-A5	Kinsale Head (KA)	Gas Producer
49/16-A6	Kinsale Head (KA)	Gas Producer
49/16-A7	Kinsale Head (KA)	Gas Producer
49/16-A9	Kinsale Head (KA)	Gas Producer
49/16-B1	Kinsale Head (KB)	Gas Producer

Well no.	Location/associated development	Present status
49/16-B3	Kinsale Head (KB)	Gas Producer
49/16-B4	Kinsale Head (KB)	Gas Producer
49/16-B5	Kinsale Head (KB)	Gas Producer
49/16-B6	Kinsale Head (KB)	Gas Producer
49/16-B7	Kinsale Head (KB)	Gas Producer
49/16-B9	Kinsale Head (KB)	Gas Producer, shut in.
Subsea Wells		
48/20-2	Ballycotton	Gas Producer; shut-in
48/25-3	SW Kinsale	Gas Producer
48/25-4	SW Kinsale (WDC)	Gas Producer
48/25-5	SW Kinsale (WDC)	Gas Producer
48/25-6	Greensand	Gas Producer
Previously abandoned exploration wells		
48/25-2	Kinsale Head	Plugged and abandoned.
49/16-2	Kinsale Head	Plugged and abandoned.
48/20-1A	Kinsale Head	Plugged and abandoned.

Seven Heads Petroleum Lease – Consent Application No.2

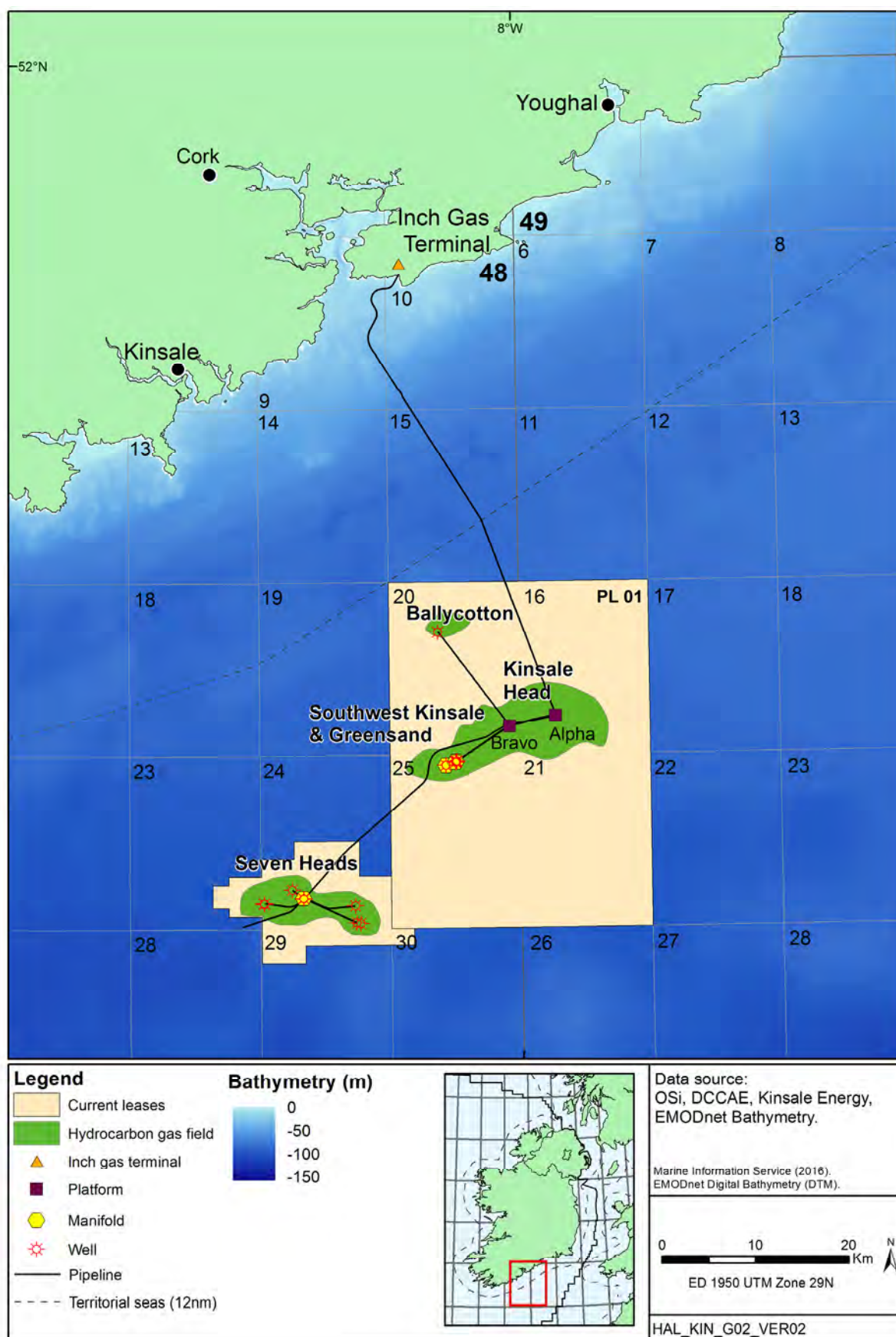
- All infield pipelines and umbilicals associated with the Seven Heads gas field
- The 18" Seven Heads export pipeline and umbilical

Kinsale Head Petroleum Lease (OPL 1) – Consent Application No.2

- The Kinsale Alpha (KA) and Kinsale Bravo (KB) jackets
- All infield pipelines and umbilicals associated with the Kinsale Head gas fields
- The 24" export pipeline (offshore and onshore section)

The EIAR and AA Screening Report enclosed with this application have, however, been prepared to assess the environmental impacts of the entirety of the proposed decommissioning of the Kinsale Area gas fields and facilities including the decommissioning of the Inch onshore gas terminal.

The decommissioning work to be undertaken under this Decommissioning Plan will be undertaken in conjunction with decommissioning of other facilities on the adjacent Kinsale Head fields as part of an integrated program for all of the offshore facilities in the Kinsale Area gas fields and facilities area.

Figure 1: Location of the Kinsale Area fields and facilities

1.3 Seven Heads Petroleum Lease

The Seven Heads Petroleum Lease details are summarised in **Table 2** below.

Table 2: Lease details

Lease	Commencement Date	Block No.	Area (km ²)	Participants (* = Operator)	% Interest
Seven Heads Petroleum Lease	13 November 2002	48/23 (p), 48/24 (p), 48/29 (p) & 48/30 (p)	168.5	*PSE Seven Heads Limited	86.5%
				Island Oil and Gas Plc.	12.5%
				Sunningdale Oils (Ireland) Limited	1%

1.4 Overview of Facilities

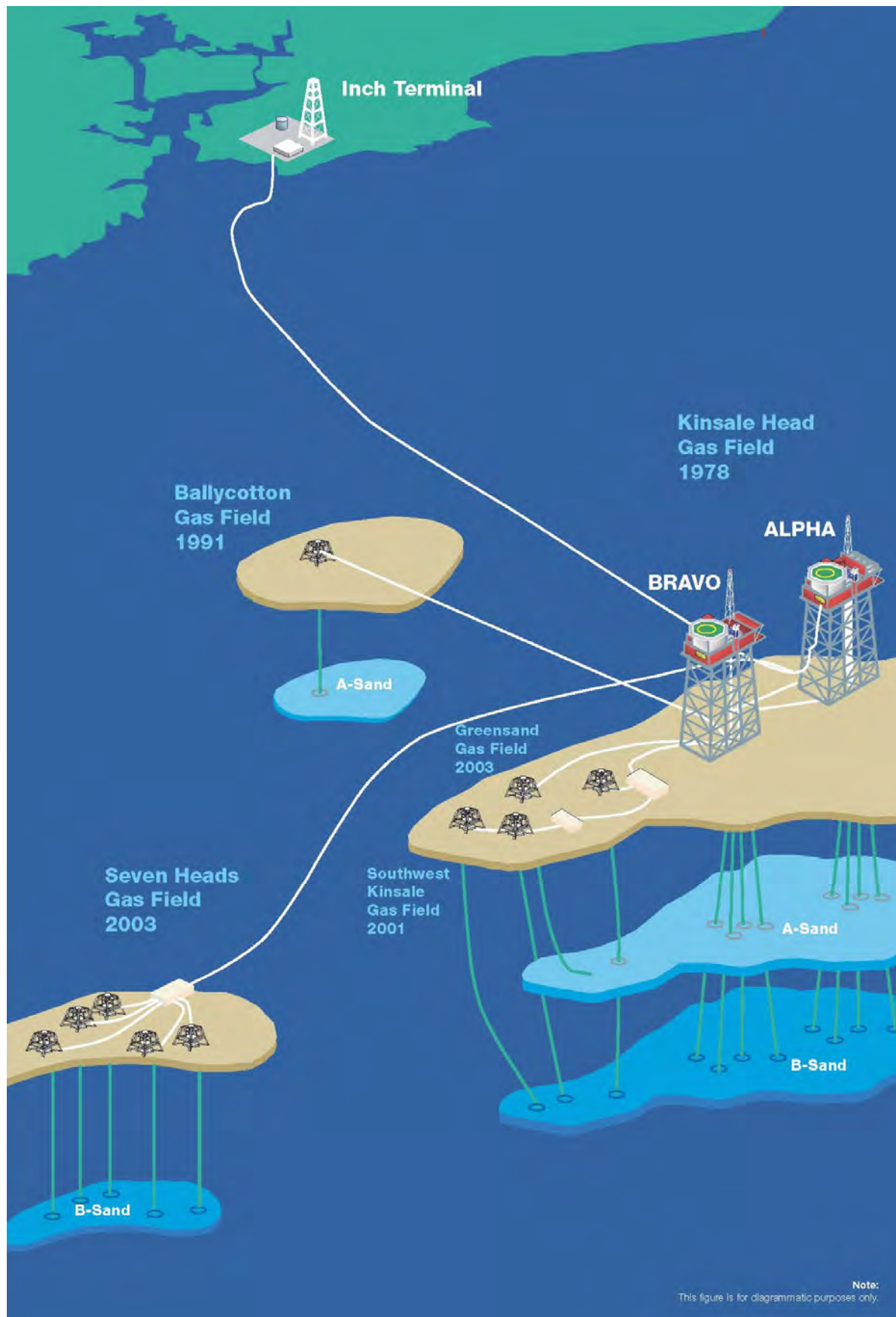
The Kinsale Area contains several natural gas fields as shown in **Figure 2** below.

The Seven Heads gas field is located within the Seven Heads Petroleum Lease.

Adjacent gas fields, Kinsale Head, Southwest Kinsale, Greensand and Ballycotton gas fields are all located within Kinsale Head Petroleum Lease (OPL 1).

The Seven Heads facilities were installed between 2002 and 2003 with gas production commencing in 2003. The fields are coming to the end of their productive life and are expected to become uneconomic around 2020/2021.

See **Section 2** for details of the facilities.

Figure 2: Kinsale Area Facilities

1.5 Overview of Statutory Background

Certain international conventions and European and national legislation form the legal framework in which the decommissioning of offshore facilities, such as the KADP, must be undertaken. The most relevant conventions and legislation which impose a requirement for a consent for decommissioning relevant to this Decommissioning Plan and/or an obligation or restriction on decommissioning options are outlined below.

Details of all relevant International Conventions and European Legislation is included in **Appendix A1**.

1.5.1 Relevant National Legislation

Petroleum and Other Minerals Development Act, 1960, as amended

The Petroleum and Other Minerals Development Act, no 7 of 1960, as amended, (“1960 Act”) regulates offshore petroleum (including gas) exploration and production activities in Ireland. The Minister for Communications, Climate Action and Environment is the competent authority under the 1960 Act.

A petroleum lease is the authorisation, issued under Section 13 of the 1960 Act, to allow the exploitation of a commercial petroleum discovery. The Kinsale Area facilities operate under two petroleum leases.

- Petroleum Lease No 1 (OPL 1 - 1970): Kinsale Head, Southwest Kinsale and Ballycotton Gas Fields, and
- Seven Heads Petroleum Lease (2002): Seven Heads Gas Field.

Following consultation with the Department of Communications, Climate Action and Environment, Kinsale Energy is submitting an EIAR to accompany the Decommissioning Plan pursuant to section 13A of the 1960 Act.

This EIAR assesses the impact of the entirety of the KADP and includes an assessment of all likely significant environmental impacts for decommissioning of the onshore gas terminal at Inch.

Continental Shelf Act

The Continental Shelf Act 1968, as amended (the “1968 Act”) is the legislative regime applying to the Continental Shelf. The Continental Shelf is the area of sea and seabed between the 12 nautical mile limit and the 200 nautical mile limit.

Section 5 (2) of the 1968 Act imposes the requirement to obtain consent from the Minister to “*construct, alter or improve any structure or works in or remove any object or material from a designated area.*”

The Continental Shelf Designated Areas Order 1993 SI 92 of 1993, Section 2, defines the “*designated area*” as the “*The area set out in paragraph 1 of the Schedule to this Order is hereby designated as an area within which the rights of the State outside the territorial seas over the sea bed and subsoil for the purpose of exploring such sea bed and subsoil and exploiting their natural resources are exercisable.*” The Schedule provides a list of points specified by latitude and longitude to define the Continental Shelf.

Apart from the Inch Terminal and the parts of the export pipeline on land and on the Foreshore, the Kinsale Area gas fields and facilities are located on the Continental Shelf. The KADP will involve altering or removing objects or material from the seabed of the Continental Shelf. Consequently, consent under the 1968 Act will be required for the KADP.

The 1992 Licensing Terms

The 1992 Licensing Terms address the surrender of a petroleum lease in Section 33³. The abandonment of wells is covered in Section 57⁴. The abandonment of fixed facilities is covered in Section 71⁵.

Under Section 28 of the 1992 Licensing Terms, Kinsale Energy must apply for the Minister for approval under Section 13/13A of the 1960 Act, as amended, for any plan of development.

The requirements of the 1992 Licensing Terms, as they relate to the decommissioning of facilities, can be summarised as follows:

- The Minister must be given at least 12 months' notice of the intention to determine the petroleum leases,
- An abandonment plan must be submitted in writing to the Minister,
- The plan must contain information on the abandonment and removal of any facilities,
- The plan must contain technical, economic and financial information, as will enable the Minister to evaluate the proposals fully and to assess their economic, social, safety and environmental implications.

These requirements, where appropriate, have been addressed in the within this Decommissioning Plan.

1.5.2 OSPAR Convention (1992)

The OSPAR Convention, OSPAR (1992), is the current legislative instrument regulating international cooperation on environmental protection in the North-East Atlantic.

It replaces the 1972 Oslo Convention on dumping waste at sea and the 1974 Paris Convention on land-based sources of marine pollution. Ireland has ratified the OSPAR Convention.

The OSPAR Convention applies to the internal waters and the territorial seas of the Contracting Parties, the sea beyond and adjacent to the territorial sea under the jurisdiction of the coastal State to the extent recognised by international law, and to the high seas, including the bed of all those waters and its subsoil, situated within specified limits of the Atlantic and Arctic Oceans.

Decisions 98/3, OSPAR (1998), amended the OSPAR Convention in 1998. Under paragraph 2 of the Decisions 98/3, the dumping, and leaving wholly or partly in place, of disused offshore installations is prohibited within the OSPAR maritime area.

1.5.3 Summary of key relevant National and European legislation

Table 3 below summarises the relevant key National, European and International legislation and the associated consents and requirements for decommissioning of infrastructure relevant to the KADP.

Table 3: Key National, European and International legislation relevant to the KADP

Relevant Legislation	Consents / requirements for Decommissioning
Section 13 of The Petroleum & Other Minerals Development Act 1960	Application will be made pursuant to Section 13 for decommissioning.
Section 5(2) of The Continental Shelf Act 1968	Application for the consent to "alter/construct/improve" works or structure in 'or remove any object or material from' the Continental Shelf designated area.

³ DMNR (1992), page 28.

⁴ DMNR (1992), page 41.

⁵ DMNR (1992), page 38.

Relevant Legislation	Consents / requirements for Decommissioning
Part IIA of the Electricity Regulation Act 1999	-Section 13D renders the decommissioning of petroleum infrastructure and the abandoning of any well as a “designated petroleum activity”. Section 13E requires a safety permit to carry out designated petroleum activity.
Section 3 of the Petroleum (Exploration and Extraction) Safety Act 2010	KEL’s current safety permit does not include decommissioning. Approval of Safety Case required for decommissioning.
Energy (Miscellaneous Provisions) Act 1995, Section 17	Minister shall not approve abandonment without consent of Minister of Marine.
European Communities (Birds and Natural Habitats) Regulations 2011 – 2015	Screening to be undertaken by competent authority to determine whether actions will affect European site. Screening appraisal report to be submitted to competent authority. Transposes Habitats Directive (92/43/EEC) and Birds Directive (2009/147/EC) into Irish Law.
Environmental Impact Assessment Directive 2011/92/EU amended by Directive 2014/52/EU	EIA Screening, and EIA if required, to be undertaken by competent authority.
Decisions 98/3, OSPAR (1998)	The dumping, and leaving wholly or partly in place, of disused offshore installations is prohibited within the OSPAR maritime area.

1.6 Methodology

This Decommissioning Plan has been prepared in line with the legislation as detailed in **Section 1.5**, and in absence of specific decommissioning guidance documents in Ireland, taking cognisance of the following guidance documents for decommissioning projects:

- [1] PAD (2004). Rules and Procedures Manual for Offshore Petroleum Production Operations Rev 4.4, 2004, Petroleum Affairs Division, Department of Communications, Marine and Natural Resources, Dublin.
- [2] PAD (2011), Rules and Procedures Manual for Offshore Petroleum Exploration and Appraisal, 2011, Petroleum Affairs Division, Department of Communications, Marine and Natural Resources, Dublin
- [3] DMNR (1992). Licensing Terms for Offshore Oil And Gas Exploration, Development & Production 1992, Department of the Marine and Natural Resources, Dublin
- [4] EPA (2014). Guidance on assessing and costing environmental liabilities 2014.
- [5] CER (2017). Safety Case Requirements. Part of the Safety Case Guidelines under the Petroleum Safety Framework. CER/16/024
- [6] DECC (2011). Decommissioning of Offshore Oil and Gas Installations and Pipelines under the Petroleum Act 1998. Version 6, 134pp. OGUK (2013a). Decommissioning of the Pipelines in the North Sea Region 2013, 48pp.
- [7] OGUK (2013). Long-term degradation of Offshore Structures and Pipelines Decommissioned and left in situ. Commissioned by Oil & Gas UK, 41pp.

1.7 Overview of Decommissioning Plan

This Decommissioning Plan details a range of selected options for the decommissioning of certain facilities within the Seven Heads gas field.

A number of options were initially considered to carry out the decommissioning of the facilities, including the consideration of alternative uses of the facilities (refer to **Section 3.3**), as well as a number of different options to carry out the physical decommissioning (refer to **Section 4**).

No feasible alternative uses for the facilities have been identified and the different methods to carry out the decommissioning have been assessed, which resulted in the identification of a number of preferred methods for the decommissioning of each facility.

The broad scope of work involved in decommissioning the facilities (covered by this Decommissioning Plan) is outlined below:

- The plug and abandonment of subsea wells, and the removal to shore for recycling/disposal of any surface component of these wells, including wellhead structures.
- The removal of subsea structures (subsea manifold) to shore for recycling remove. In addition short pipeline spools/umbilical jumpers will be removed to facilitate the removal of the structure. All associated pipeline protection will also be removed.
- The recovery of large items of debris and post-decommissioning survey to confirm success of the decommissioning operations

Table 4 sets out a summary of the proposed decommissioning options considered, as well as any alternative option which was considered to be technically feasible.

As there is no alternative but to plug and abandon the wells and to remove the subsea structures, the only alternative options available are those associated with the different methods of removing the facilities.

In addition to the wells and subsea structures there will be a requirement to remove short pipeline spools/umbilical jumpers to facilitate the removal of the structures. All associated spool/jumper protection will also be removed.

Table 4: Summary of proposed decommissioning options for the Seven Heads Facilities (Consent Application No.1)

Section Ref.	Facility	Decommissioning Option Assessed	Method	Vessel Type ⁶	Alternative Options Initially Considered
6.3.2	Subsea structure	Full Removal	Single Lift	DSV	Leave <i>in situ</i> was initially considered as an alternative for the subsea structures but due to legal obligations for the complete removal of structures (OSPAR convention refer to Section 1.5) this was not considered further.
6.3.1	Subsea Wells	Plug and Abandon well.	“Thru-tubing”	a. Semi-submersible rig b. Light well intervention vessel / semi-submersible rig	No technically recognised alternative

⁶ Note that only the principal vessels involved are listed in this table, however other vessels, for example construction support (CSV), anchor handling (AHV), platform support (PSV) and guard vessels will also be used and are listed in full in relevant sections below.

1.8 Objective of Decommissioning project

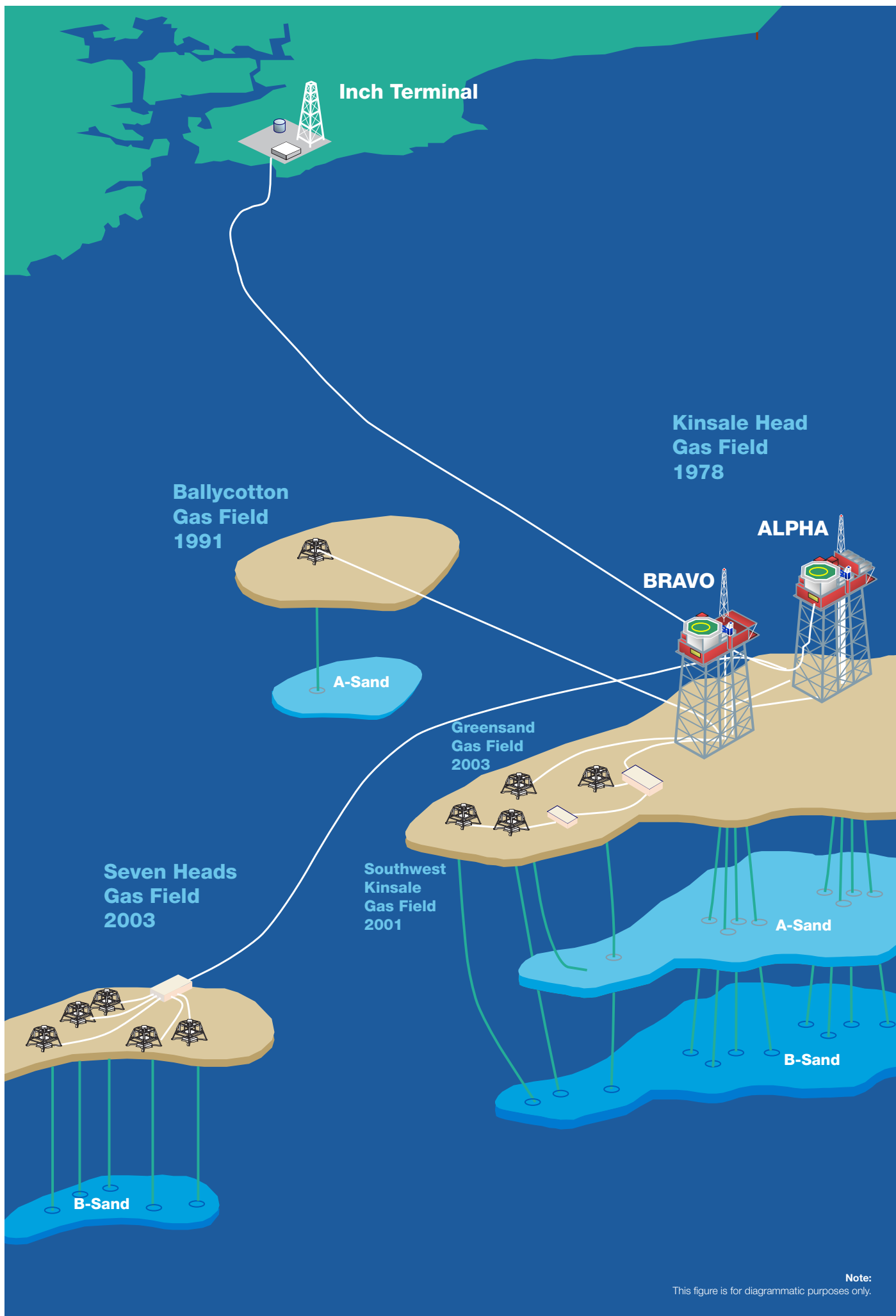
The objective of this Decommissioning Plan is to ensure that the decommissioning is undertaken in a safe, environmentally friendly and cost efficient manner. The Kinsale Area Decommissioning Project will ensure minimum impact on the environment and residual risks and liabilities will be managed appropriately. The Decommissioning Plan will ensure that the necessary measures are identified, managed and monitored to lead to successful decommissioning.

The criteria which define the successful decommissioning of the facilities are as follows:

- Compliance with the Minister's consent requirements.
- All decommissioning activities completed safely and with due regard to the environment.
- All activities undertaken in compliance with laws and regulations.
- All works carried out in accordance with good oilfield practice.
- All facilities will be safely decommissioned using standard procedures and appropriately licensed contractors.
- All disposal of wastes, materials and substances will comply with regulatory requirements.
- All records relating to decommissioning and the disposal or recycling of wastes, materials and substances retained throughout the closure process and made available for inspection thereafter through the DCCAE.
- Hazards and environmental risks addressed and the Minister satisfied that the Kinsale Area has minimum impact on the Environment.
- An Environmental Management System in place and actively implemented during the decommissioning period.
- Residual (post-decommissioning) risks reduced to a satisfactory level.
- Appropriate funds in place to cover the costs.

Section 2

Facilities Description



2 Facilities Description

2.1 History of Operations

The Kinsale Head gas field was discovered in 1971 and was brought on-stream in 1978 under a Plan of Development approved by the then Dept. of Industry and Commerce. The Kinsale Head field was developed with two fixed steel platforms (Kinsale Alpha and Kinsale Bravo) with gas exported by pipeline from Kinsale Alpha to the onshore Inch Terminal. The discovery of the field was the basis for the development of the natural gas industry in Ireland and Kinsale Head was Ireland's only source of gas until the installation of an interconnector pipeline from Scotland in 1993.

Following the Kinsale Head discovery, there was extensive exploration of the Celtic Sea with ~90 wells drilled, the last was the Midleton well in Block 49/11 drilled by Kinsale Energy in 2015. However, despite the intensive exploration effort, no other large fields have been discovered, although a number of smaller gas fields have been commercially exploited as subsea tie-backs to Kinsale Head, including the Seven Heads field, which was the last development in the area.

The development of the smaller gas fields, which would not have been economic on a stand-alone basis, and technical modifications to the Kinsale Head facilities (e.g. installation of compression), have prolonged the life of the main field which has allowed continued production from satellite fields, such as Seven Heads even at very low flowrates. This has effectively extended the economic life of the Seven Heads field beyond a level that would be sustainable on a stand-alone basis.

The Kinsale Area fields, infrastructure and production status are summarised in **Table 5**, for information.

Table 5: Summary of Development History for the Kinsale Area Fields

Lease	Field	No. of Wells	Facilities	Date/First Production	Status (2017)
OPL-01	Kinsale Head	14	<u>Kinsale Alpha</u> (Manned Platform with production, drilling & accommodation) 7 x Platform Wells	1978	Producing
			Compression added	1992	
			<u>Kinsale Bravo</u> (Manned Platform with production, drilling & accommodation) 7 x Platform Wells	1979	Producing (1 Well Shut-In)
			Compression added	1993	
			Converted to Normally Unmanned Installation	2001	
	Ballycotton	1	Ballycotton Subsea Well	1991	Shut-In
	Southwest Kinsale *	3	3 x Subsea Wells	1999 – 2001	Producing
	Greensand	1	1 x Subsea Well	2003	Producing
Seven Heads	Seven Heads	5	Subsea Manifold 5 x Subsea Wells	2003	Producing (1 Well Shut-In))

The Seven Heads field (**Figure 5**) was developed by a group led by Ramco Energy in 2003; Ramco's interest (86.5%) was subsequently acquired by Marathon in 2006 and is now operated by PSE Seven Heads Limited, a subsidiary of PSE Kinsale Energy Limited.

The Seven Heads development consisted of the addition of a new cantilever structure to the Kinsale Alpha (KA) platform and associated vessels and pipework. Subsea installations included a new 18" pipeline and control umbilical from KA to the Seven Heads Field, a subsea manifold, 6 well flow lines and 5 wells and associated well head structures.

Although the Kinsale Head field has no condensate associated with it, the Seven Heads field, which is tied back to Kinsale Alpha, produces very small, non-commercial amounts of light condensate which is extracted on the Kinsale Alpha platform and sent to shore in tote-tanks, with no associated discharges. The Seven Heads reservoir does not produce sand, and the water associated with the gas is "water of saturation" and is fresh water.

No solid sample taken from the Kinsale Area platforms or associated wells, has ever been classed as positive for low specific activity (LSA) or Naturally Occurring Radioactive Material (NORM). This demonstrates that there is no LSA or NORM associated with the Kinsale Area platforms.

Oil-Based Muds were not used in the drilling of any of the Seven Heads wells and there are no well cutting piles associated with any of the drilling locations. This was confirmed by the 2017 seabed survey.

2.2 Inventory of Facilities

The facilities to be decommissioned, relevant to this Decommissioning Plan, are detailed, illustrated (**Figures 3 to 6**) and summarised (**Table 6 and 7**) in the following sections.

This Decommissioning Plan is only for the Seven Heads Manifold, 5 subsea development wells and associated wellhead structures and wellhead removal on one previously abandoned exploration well. Any spool pieces and protection material which need to be removed to allow the decommissioning of the wells and manifold are also included in this plan.

The Seven Heads cantilever and associated process equipment on Kinsale Alpha will be decommissioned as part of the Kinsale Head decommissioning works.

Well completion diagrams and layout drawings of all facilities within the Seven Heads Lease are included in **Appendix A2 and A3**.

2.2.1 Seven Heads Subsea Wells

Five development wells were drilled and completed in the period 2002-'03 (see Completion Diagrams in **Appendix A2**). Each well is fitted with a subsea Xmas Tree with an integral protection structure (see **Figure 3**). Four of the wells will be abandoned using a "thru-tubing" approach whereby cement plugs will be placed through the existing well tubing, prior to recovery of the top section of tubing, surface casing and wellhead. One of the wells, 48/24-8, requires tubing recovery and remedial cementing prior to setting cement plugs. The well works on the development wells will be carried out by a MODU (well 48/24-8) or by a MODU or LWIV (other wells).

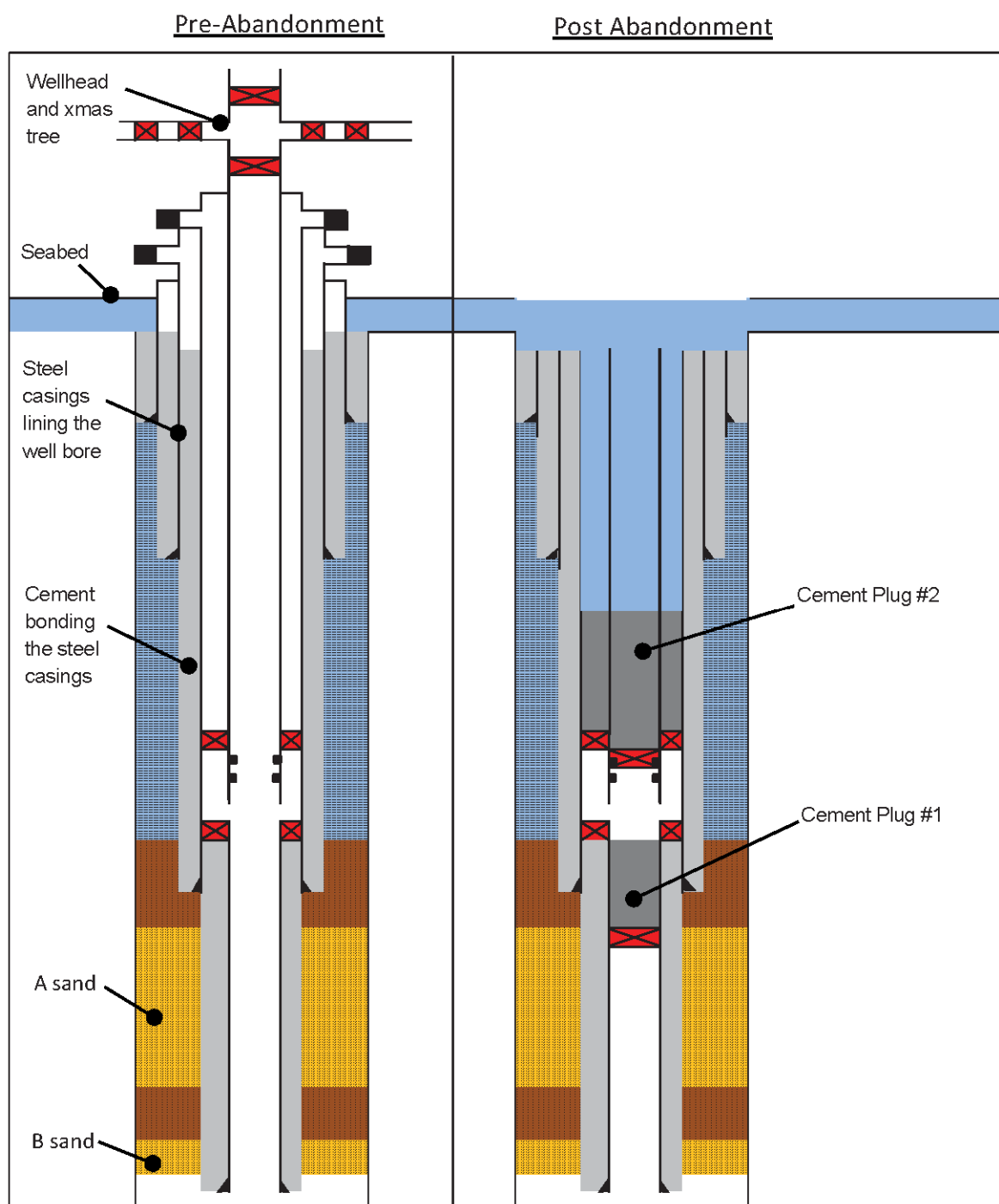
There are currently 500m exclusion zones, for other sea users, around each of the Seven Head development wells – these will be removed following completion of the decommissioning works.

Well 48/23-3 which was temporarily abandoned in 2006 will have the wellhead and surface casing removed by cutting at a depth of 3m below the mud-line – this work will be done by a Construction Support Vessel (CSV).

A typical well status diagram, pre-and post-decommissioning, is shown in **Figure 4**.

Figure 3: Subsea X-mas Tree



Figure 4: Typical Well Abandonment Diagram

2.2.2 Seven Heads Subsea Manifold

The Seven Heads subsea manifold (**Figure 5**), connects the 18" export pipeline to six separate 8" flowlines and umbilicals of various lengths (0.06-7.5km).

The unit consists of the following:

- a piping manifold, which allows flow from the various well flowlines to be commingled and routed into the 18" pipeline to Kinsale Alpha

- a controls distribution unit which routes electrical, hydraulic and chemical service lines from the main umbilical to the various in-field umbilicals
- a protective structure which houses the above

Six infield pipelines and umbilicals are connected to the subsea manifold, but only 5 are connected to active subsea wells (48/24-5A, 48/24-6, 48/24-7A, 48/24-8 and 48/24-9), as the sixth well (48/25-10) was not completed. All flowline and in-field umbilical connections to the manifold are protected with concrete mattresses protection – details are shown in **Appendix A3**. All tie-ins and their associated protection material will be disconnected and removed prior to the removal of the manifold. Any exposed pipeline ends will subsequently covered by rock placement.

Figure 5: Seven Heads Facilities

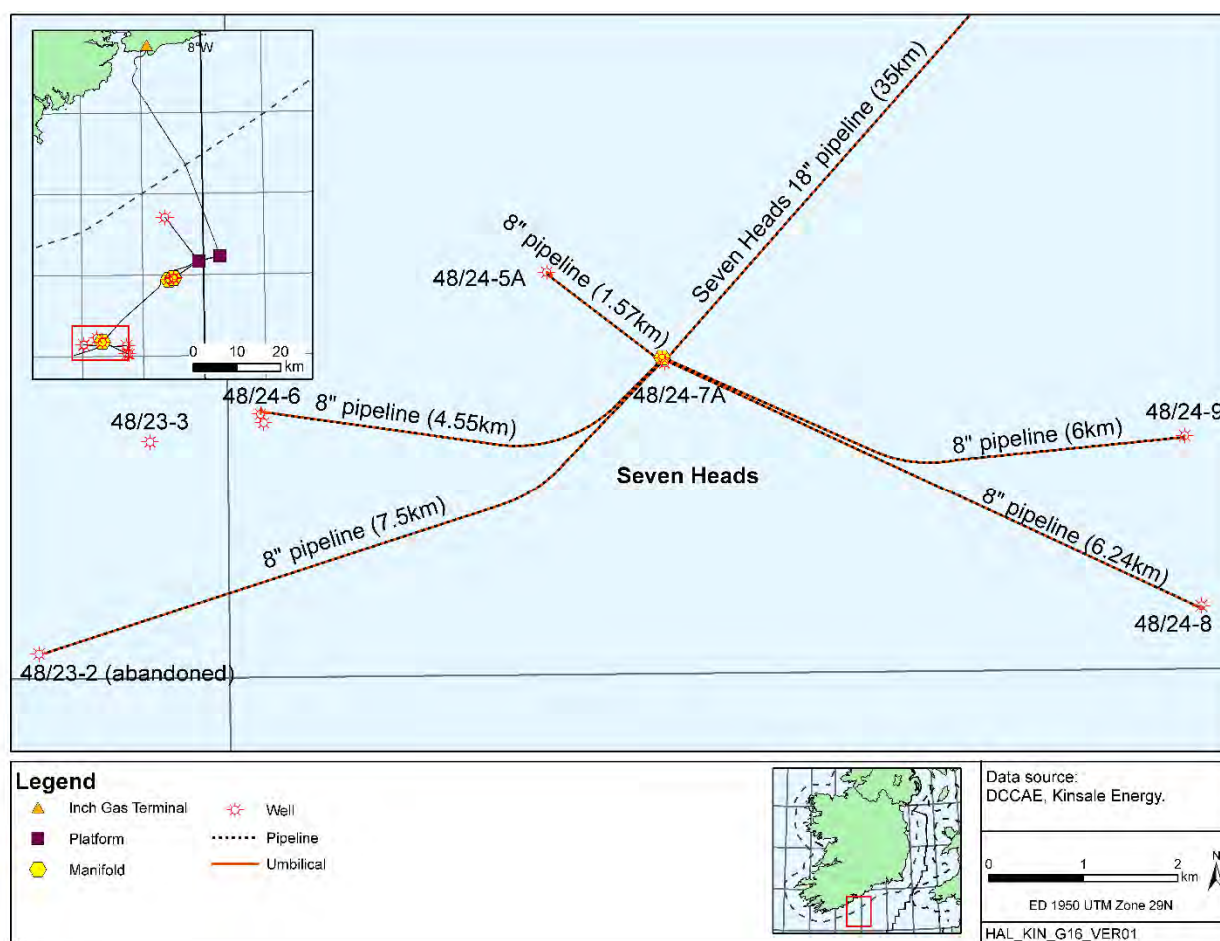


Figure 6: Seven Heads Manifold

2.2.3 Summary of Seven Heads Lease Facilities (Consent Application 1)

Tables 6 and 7 summarise the Seven Heads facilities to be decommissioned as detailed herein.

Table 6: Seven Heads wells to be decommissioned

Well no.	Drill date	Location/associated development	Present status
Subsea Wells and Associated Well Head Structures			
48/24-5A	05/08/2001	Seven Heads Gasfield: 51° 12' 18" N/08° 21' 05"W	Gas Producer; shut-in
48/24-6	15/03/2003	Seven Heads Gasfield: 51° 11' 30" N/08° 23' 42"W	Gas Producer
48/24-7A	16/05/2003	Seven Heads Gasfield: 51° 11' 47" N/08° 20' 02"W	Gas Producer
48/24-8	12/06/2003	Seven Heads Gasfield: 51° 10' 22" N/08° 15' 10"W	Gas Producer
48/24-9	24/06/2003	Seven Heads Gasfield: 51° 11' 21" N/08° 15' 19"W	Gas Producer
48/23-3	03/05/2006	51° 11' 21" N/08° 24' 43"W	Temporarily Abandoned pending wellhead removal

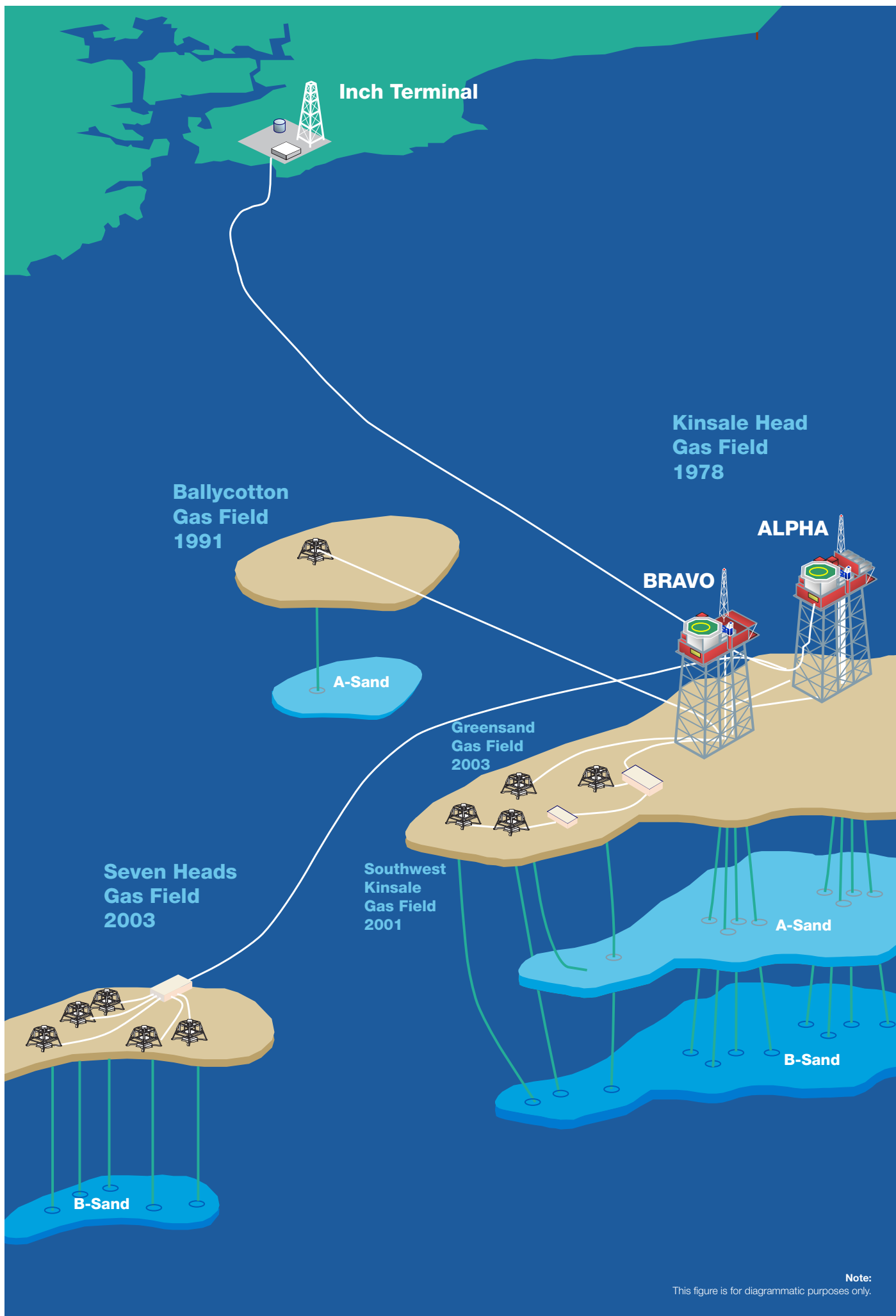
Table 7: Subsea infrastructure to be decommissioned

Seven Heads Manifold	
Manifold housed within a rectangular steel protection frame with diagonal rakers at the corner members. Drop-in ballast weight inserts in the corner tubular members.	
Main structure:	17x12mx6m (to end of diagonal rakers), 66.1Te
Manifold module:	36.7Te
Corner weights:	19.5Te (x4)
Total:	190Te

Source: Genesis (2011), Xodus (2016c)

Section 3

Cessation of Production



Note:
This figure is for diagrammatic purposes only.

3 Cessation of Production

3.1 Reasoning

The Seven Heads gas field has been in production since 2003 and it is expected that the economic extraction of gas will no longer be viable by approximately 2020/2021, whereupon the field will be shut-in, the wells plugged and abandoned and the associated facilities decommissioned as described below.

The main producing reservoirs in the Upper Wealden ("B" Sand) formations have been drawn down to extremely low pressures and shut in reservoir pressure will be less than 100 psia at cessation of production, such that there are no further cost-effective production technology modifications that can be applied. The subsea production wells are operating with very low bottom-hole pressures and the Kinsale Alpha first-stage compressor suction pressure is less than 5psig, which is approaching a technical limit for offshore natural gas.

The original Seven Heads Field Development Plan envisaged a 20 year production profile with an economically recoverable reserve of 300 BCF and a recovery factor of 55%, but this estimate had to be revised downwards significantly soon after production commenced due to the gas field's poorer than expected performance.

The Seven Heads gas field has produced ~32 BCF of gas since start up to the end of 2017 and is ultimately expected to produce ~34BCF or approx. 92% of the revised estimated Gas in Place in the reservoir.

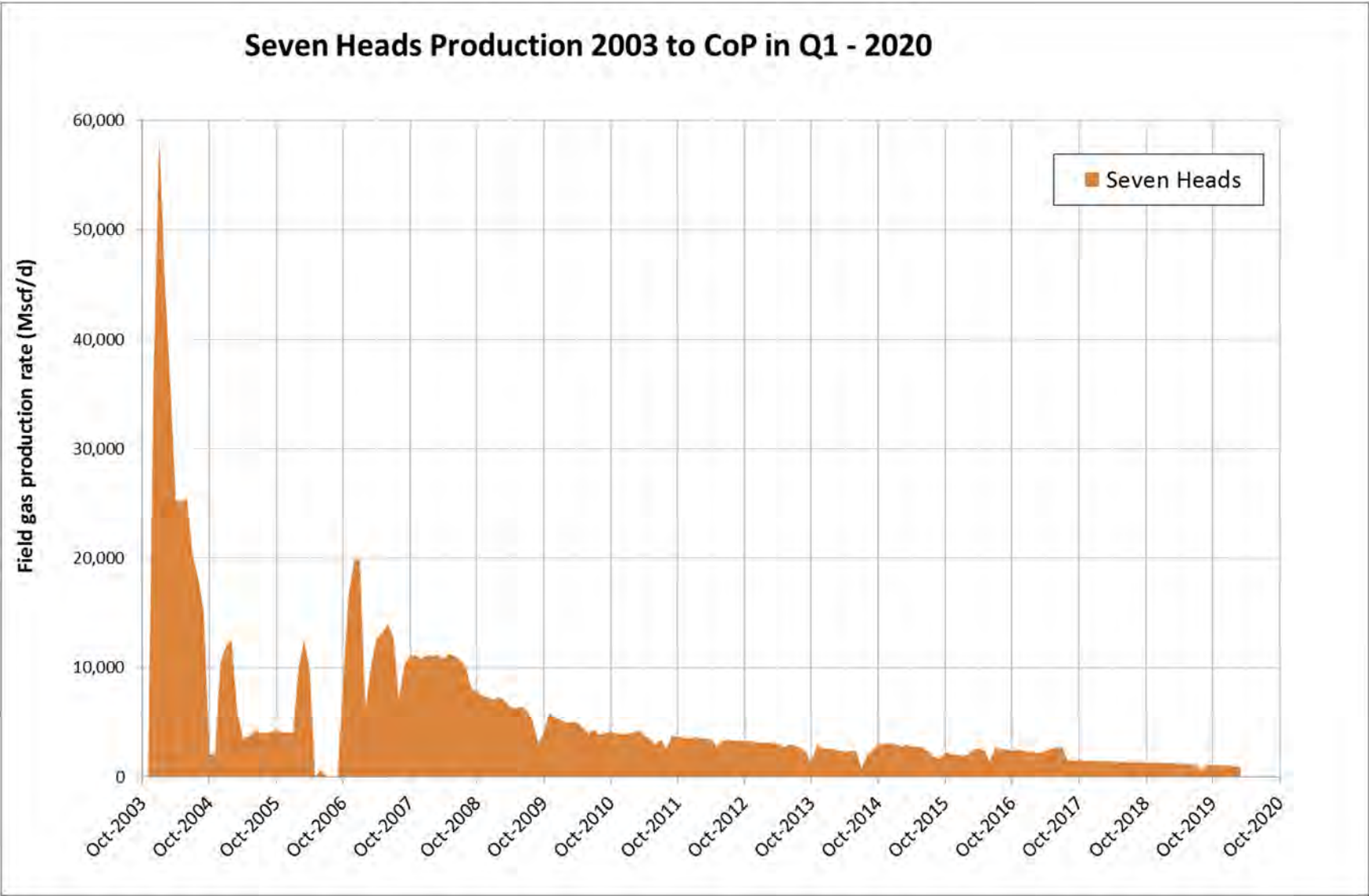
Peak production levels were achieved shortly after production commenced in 2003 but current (2018) daily average production rates are less than 3% of peak rates. **Figure 7** is a graph showing daily average gas production from the fields to date. Field and facility performance have been carefully and pro-actively managed to maximise and extend economic production. However, given the continuing declines in gas rates, no economically sustainable investment program or technical improvements can be implemented to extend economic production.

An application for consent to cease operations in accordance with section 8.8 of the PAD Rules & Procedures Manual for Offshore Petroleum Production Operations will be submitted to DCCAE at least 12 months prior to the proposed CoP date.

3.2 Technical and Economic Evaluations

Kinsale Energy will separately submit to the Minister a report detailing its technical and economic evaluations that support the CoP timeframe proposed in this Decommissioning Plan.

Figure 7: Seven Heads gas field – production rates



3.3 Other Uses Considered for the Facilities

For information, included here are options considered for the entire KADP facilities, however for the Seven Heads facilities included in this Decommissioning Plan there are no technical options available other than to plug and abandon the wells and in accordance with OSPAR Decision 98/3 the subsea facilities must be removed.

The Kinsale Area facilities have been designed for dry gas production and processing, and the majority of the facilities are now close to or beyond their original design lives. Nevertheless, parts of the facilities may be suitable for re-use, depending on the service, particularly the main Kinsale and Seven Heads export pipelines and the platform jackets.

Three potential re-uses have been considered at a high level. These are hydrocarbon production, carbon capture and storage (CCS) and offshore wind energy production.

Hydrocarbon Production

The Kinsale Area facilities are not designed for liquid hydrocarbon or wet gas production and are unlikely to be suitable for such use. Some of the facilities could potentially be re-used for a future dry gas development as host infrastructure. However, there are currently no known commercial dry gas discoveries in the vicinity nor is Kinsale Energy aware of any firm drilling plans for dry gas prospects within tieback distance of any of the facilities. There are a number of appraisal wells planned in the Barryroe field and the 18" pipeline from Seven Heads to Kinsale Alpha, could be used for export of associated gas from a potential development of that field

Carbon Capture and Storage

Kinsale Energy has carried out technical studies which would indicate that the main Kinsale Head reservoir may be suitable for CCS and also that some of the Kinsale Area facilities may be suitable for CO₂ transportation, particularly the 24" export pipeline and the jackets.

There is currently no commercial case for a merchant CCS service as CO₂ prices are too low to justify the required investment, however, this may change in the coming years. It is also noted that there is a proposal in Ireland's current National Mitigation Plan (July 2017) for DCCAE to explore the feasibility of utilising suitable reservoirs for CO₂ storage within the next 5 years. A feasibility study into the use of the Kinsale Head reservoir for CCS is being undertaken by Ervia.

Offshore Wind Energy Production

The main 24" export pipeline and landfall could possibly have a use as a cable conduit, for either fibre optic or high-voltage direct current (HVDC) cables (for example as part of a windfarm). The platform jackets could be used to support HV convertor stations. Kinsale Energy is not aware of any wind farm development being considered for the vicinity of any of the Kinsale Area facilities, so no proposal currently exists at this time.

Conclusion

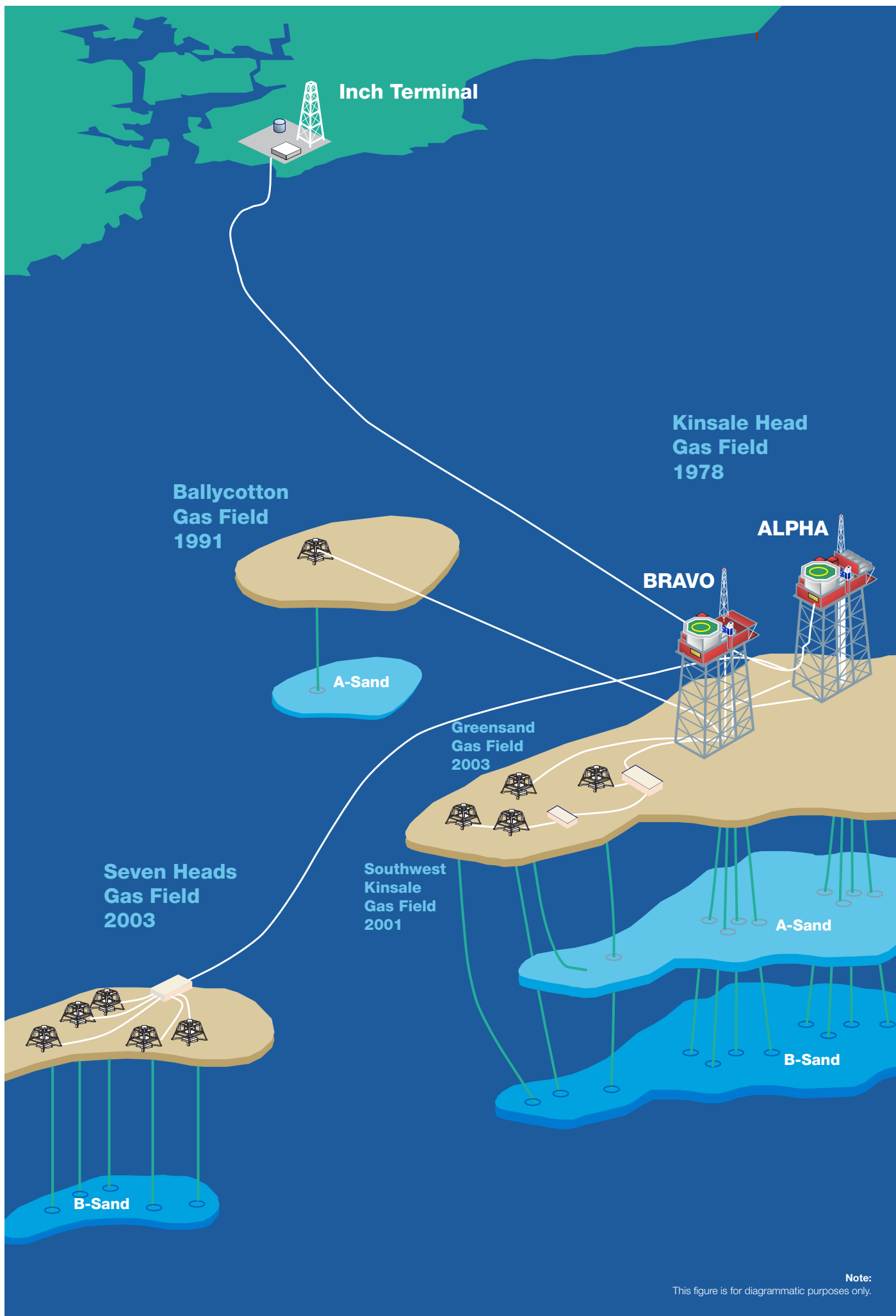
No other re-use options have been identified at present. Should future circumstances change with respect to the potential for any of the re-use options identified above, then a leave *in situ* option, particularly with regard to the 18" Seven Heads export pipeline and the main 24" export pipeline and landfall, could facilitate the re-use of that infrastructure in the future. Additionally, the platform jacket removal campaign may be scheduled over a number of years (1-10 years), depending on vessel availability, cost efficiency and company strategy, which could extend the period over which an alternative use may be identified.

The above considerations inform a staged approach to the consent application process for the project, such that the wells, platform topsides, and subsea structures comprise the first consent application, and the pipelines and platform jackets comprise the second consent application.

Should any of the potential re-use proposals be taken forward, they would be subject to the requisite environmental assessments and consents at the appropriate time, which would also include a cumulative assessment of the decommissioning of the Kinsale Area facilities.

Section 4

Decommissioning Options



Note:
This figure is for diagrammatic purposes only.

4 Decommissioning Options

As no feasible alternative uses for the Kinsale Area facilities, including the Seven Heads facilities, have been identified currently, the facilities will be decommissioned. This section details the various decommissioning options which were considered for the Seven Heads facilities and the reasoning for the identified preferable options included in this Decommissioning Plan (**Section 1.7**).

4.1 Subsea Wells

There is no technical alternative to decommissioning the subsea wells other than plugging and abandoning the wells.

The wells will be abandoned using a 'Thru tubing' technique using a semi-submersible rig or a light well intervention vessel.

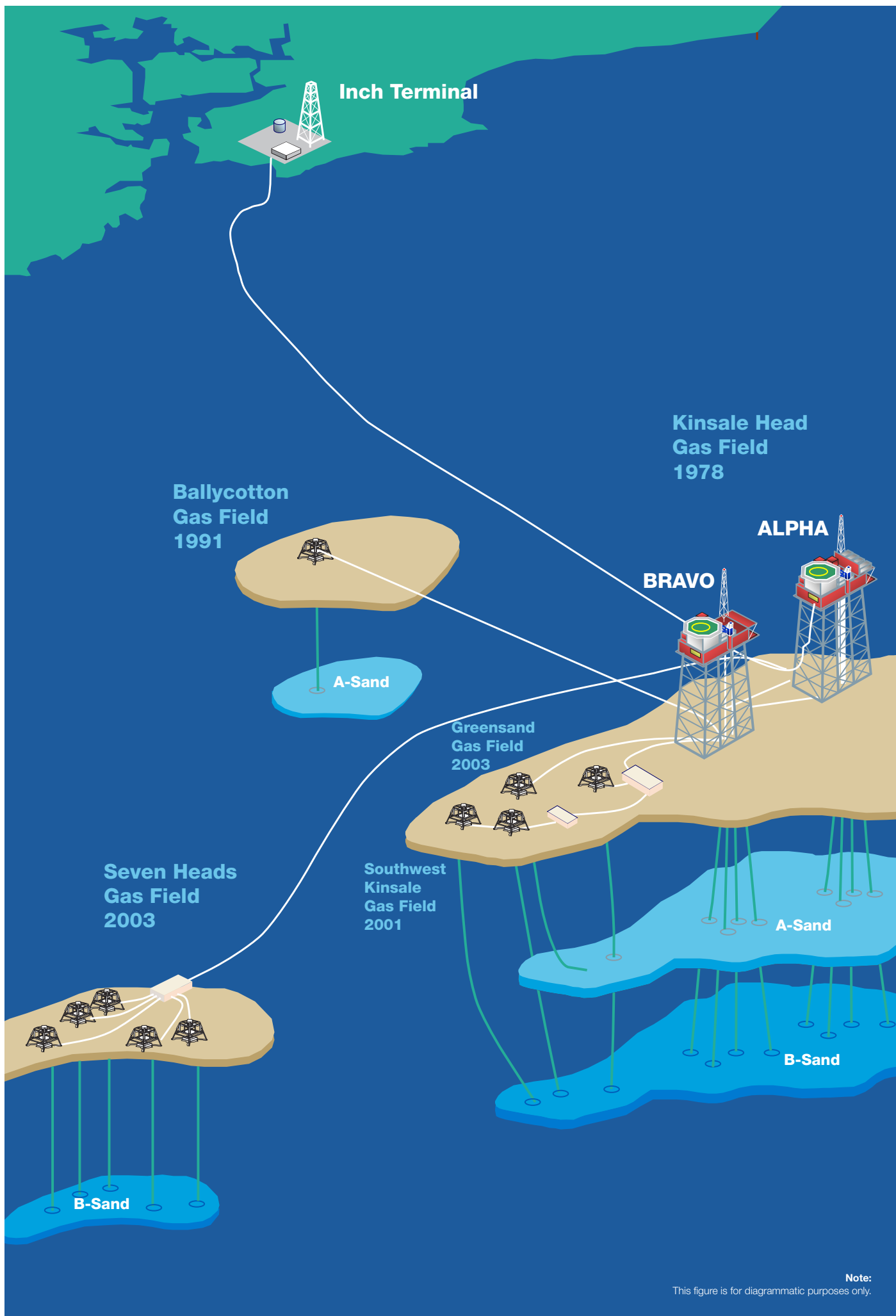
4.2 Subsea Structures

OSPAR decision 98/3 states that, unless in exceptional circumstances, all subsea structures are to be removed during decommissioning, unless they are to remain *in situ* for an alternative use.

With no potential alternative use identified for the subsea structures, and to ensure compliance with OSPAR, Kinsale Energy proposes to remove all subsea structures including the Seven Heads manifold.

Section 5

Decommissioning Project Management



Note:
This figure is for diagrammatic purposes only.

5 Decommissioning Project Management

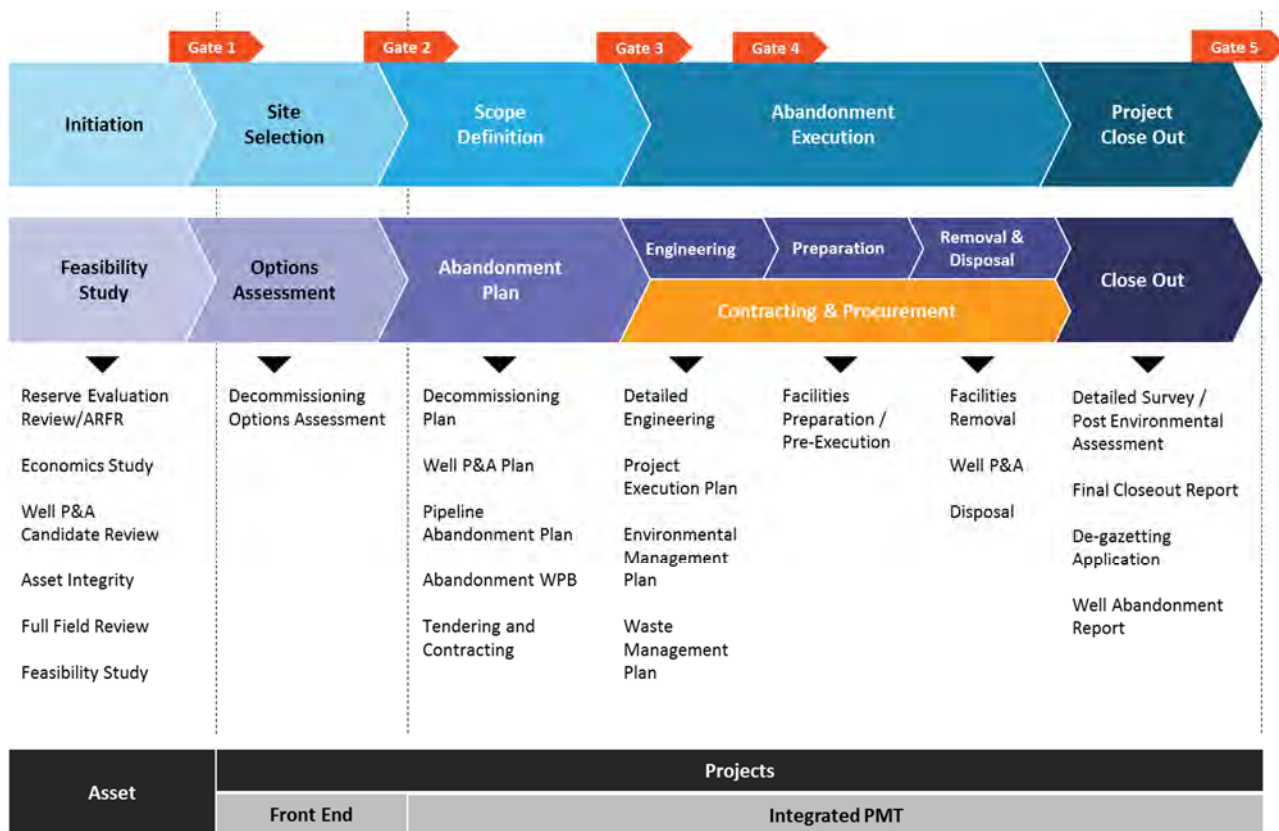
5.1 Project Management Approach

The decommissioning project will be carried out in accordance with the PETRONAS Project Management System (PPMS). The PPMS is a gated process which segregates a project's life cycle into distinct phases.

The key objective of the PPMS document is to promote consistency in application and approach when undertaking projects managed by PETRONAS.

PETRONAS have developed a PPMS system specifically for decommissioning projects as detailed in **Figure 8** below.

Figure 8: PETRONAS Project Management System for decommissioning projects



Completion of this Decommissioning Plan, managing all permitting, licences, authorisations, notices, consents and consultations and nomination of the decommissioning works contractors fall within Gate 1, 2 and 3 of the overall KADP, for which Kinsale Energy will also be responsible.

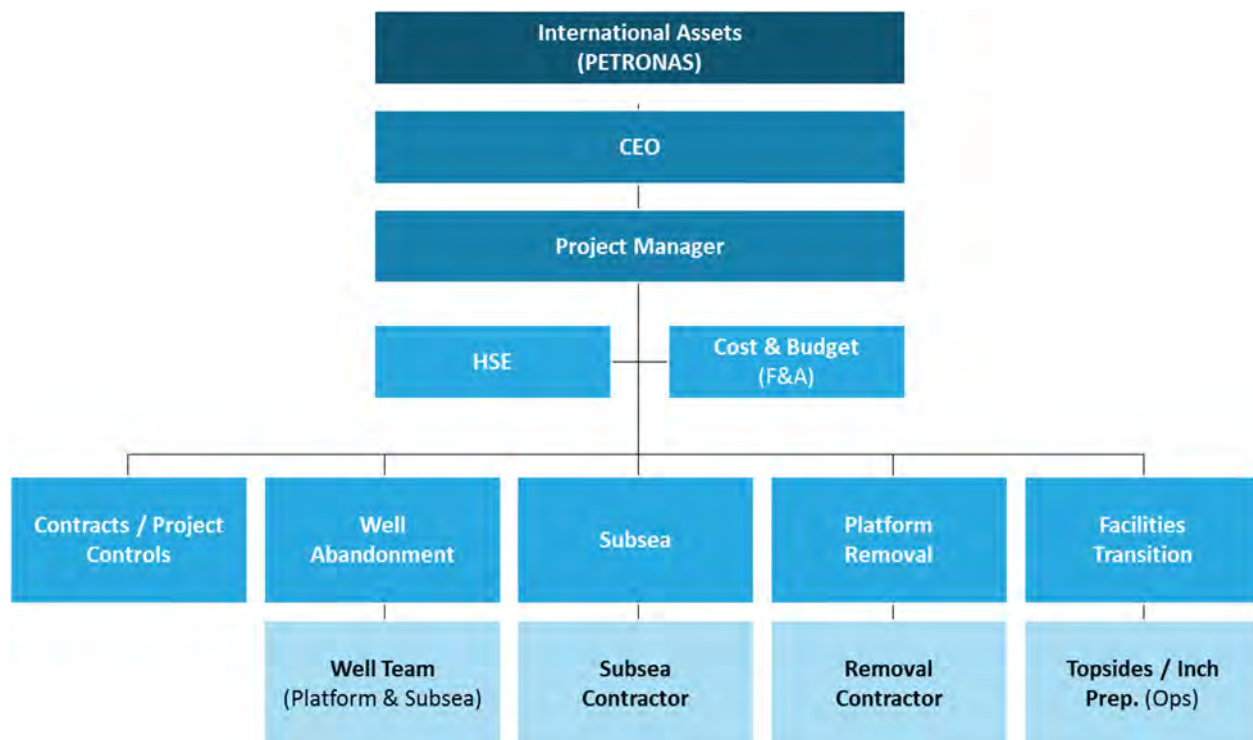
The selection of the final decommissioning methodology will fall within Gate 4 which will be the responsibility of the selected removal contractors, in conjunction with Kinsale Energy. Execution, management of the works and project close-out will be the responsibility of the selected removal contractors.

5.2 Organisation

The project organisation will change through the life of the project to reflect the work scope. Initially, a small in-house Kinsale Energy team will manage the regulatory and permitting process of the KADP. This team will be expanded in line with the Project Execution Plan (PEP) with existing KEL personnel being augmented as

required by specialist contract personnel or by secondees from PETRONAS. The overall project organisation of the execution phase is expected to be as shown in **Figure 9**.

Figure 9: Project Team – Execution Phase



5.3 Resources

The following key positions are critical for project success and will be filled by Kinsale Energy/PETRONAS for the duration of the decommissioning works schedule:

- Head of Decommissioning
- Project Controls Manager
- Topsides Facilities Decommissioning Coordinator
- Subsea Infrastructure Decommissioning Coordinator
- Well Abandonment Coordinator
- Onshore Site Decommissioning Coordinator
- Project Engineers
- HES Manager
- Decommissioning Contracts Manager
- Project Planner

Additional external support may also be required from 3rd party organisations and consultants:

- Wells Engineering Team
- Other (public relations, marketing, legal advice etc.)

It should be noted that all of the offshore project activities up to the point where the platforms are “hydrocarbon free” will be carried out within the existing KEL operations framework and the platforms will be manned by KEL and contractor personnel under the control of the platform Offshore Installation Manager (OIM). Following handover to the removal contractor, an offshore decommissioning management team will be put in place by the contractor, with overall project supervision and monitoring being maintained by the KEL project team.

5.4 Costs

An indicative estimate of the overall cost will be provided separately to the PAD.

5.5 Reporting

Reports to be issued during the decommissioning process will be agreed with the regulators (PAD, CRU and other regulatory bodies) at the Regulatory Approval stage; however, the following reports are proposed.

Monthly Progress Report

Following approval of the Decommissioning Plan a Monthly Decommissioning Progress Report will be submitted to PAD; it is intended that this will be the primary reporting mechanism throughout the project, supplemented by other reports as required, e.g. operational site reports etc.

The purpose of the Monthly Progress Report is to notify to the PAD details of:

- a) the status and progress of decommissioning, including engineering, planning and operations and
- b) any unusual occurrences, including accidents, pollution and other HS&E incidents.

Each Monthly Project Progress Report will:

- a) cover one calendar month and
- b) will be submitted within 25 days of the end of the report period.

The Format for the Monthly Project Progress Report will generally be in accordance with the requirements set out in Appendix D of the Rules & Procedures for Offshore Production Operations

Operational Reports

During the course of decommissioning operations, a number of additional reports may be generated, depending on the specific activity in progress, e.g.:

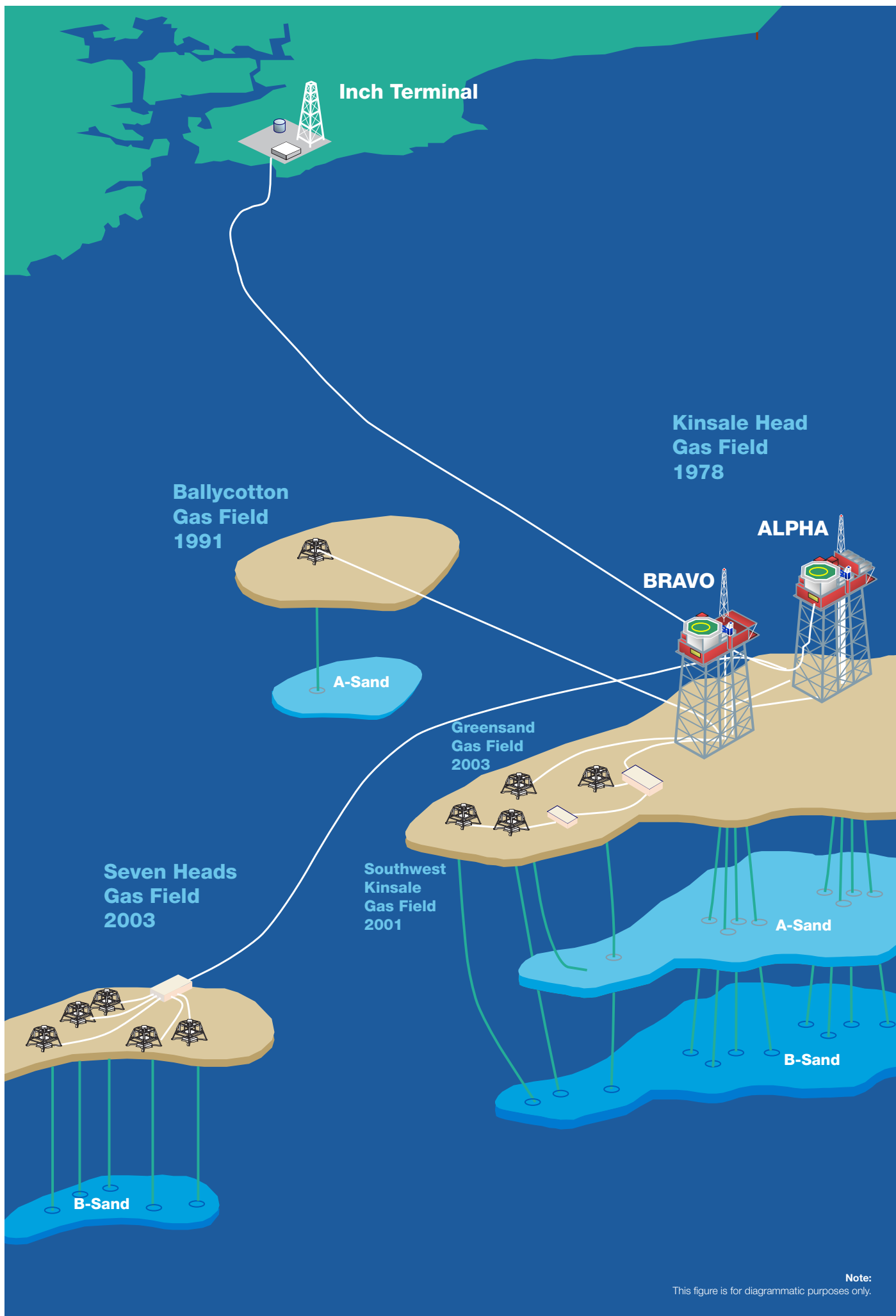
- Well abandonments – Daily Operations Summary
- Subsea/marine operations – weekly activity summary

Post-Decommissioning Reports

- Decommissioning Close Out Report (refer to **Section 7.3**) including
 - Seabed Clearance Survey Report
 - Well Status Report
 - Environmental Summary Report

Section 6

Decommissioning Activities and Schedule



Note:
This figure is for diagrammatic purposes only.

6 Decommissioning Activities and Schedule

Note: This section provides general information on the activities to be carried out as part of the overall Decommissioning Project, with specific reference to the Seven Heads facilities where relevant.

6.1 Pre-Cessation of Production Activities

During the period leading up to Cessation of Production (CoP) a number of preparatory activities may be undertaken on the Kinsale Head platforms to ensure that the facilities are ready to start decommissioning activities immediately following CoP. These preparatory activities may include:

- Removal of redundant equipment
- Installation of additional/replacement utilities e.g. temporary power generation & distribution
- Preparation of lay-down areas for well servicing equipment
- Local structural modifications for decommissioning equipment
- Installation of temporary accommodation units (Bravo)

Any activities or modifications required pre-CoP will be planned and carried out in accordance with KEL's current operational procedures and in compliance with the Production Safety Case.

6.2 Post CoP Activities/Pre-Decommissioning Activities

Following Cessation of Production it is intended to immediately commence the process of making the facilities "hydrocarbon-free" – this includes a number of activities including:

- Pipeline Contents Displacement, including Seven Heads pipeline & flowlines
- Topsides Disconnection and Gas-freeing,

All of the offshore project activities up to the point where the platforms are "hydrocarbon free" will be carried out within the existing KEL operations framework and will be covered in a Decommissioning Safety Case to be submitted to the CRU.

6.2.1 Pipeline Displacement

The pipelines connecting each of the subsea well installations to their respective platforms (Alpha or Bravo) will be displaced with seawater by means of pumping spreads located on the platforms – water will be pumped from the platform and into the connected wells, which will all be at low pressure (sub-hydrostatic). Subsequently, the pipelines will be disconnected at the subsea well locations.

For the Seven Heads lines, the contents of all well flowlines will initially be displaced into their respective wells by pumping through the 18" trunkline and the subsea manifold. After this, the main 18" trunk line, which may be retained for possible future use, will be filled with inhibited sea-water to limit corrosion. The line will subsequently be fitted with a blank flange when it is disconnected from the subsea manifold, which is to be removed.

6.2.2 Topsides Disconnection and Gas-Freeing

In parallel with the pipeline displacement campaign, the platform topsides facilities will be made safe, all pressure vessels and piping will be vented and purged and non-essential electrical supplies will be disconnected.

Volumes of waste (fluids and associated debris) from the topsides are expected to be small as the hydrocarbons produced are dry natural gas (e.g. no sludges or solid NORM material are present). These wastes, along with any residual inventories of diesel, chemicals, condensate or aviation fuel, will be collected for onshore disposal under Kinsale Energy's existing waste management procedures following CoP.

6.3 Decommissioning Activities

6.3.1 Subsea Well Abandonment

Each of the Seven Heads wells will be decommissioned by setting a cement plug or plugs to seal the tubing/casing strings and then recovering the top section of tubing and casing from the well. The well conductors at the surface and the Xmas Trees will also be removed and recovered. It is expected that 4 of the wells can be abandoned by placing cement through the existing well tubing, however, well 48/24-8 will require remedial cementing of the 9 5/8" casing which will require removal of the well tubing. The main steps involved are summarised in **Table 8** below.

Table 8: Subsea well abandonment main steps

Item	Operation
1	Re-enter well and displace well bore to seawater
2	Slickline thru-tubing cementing and cutting and recovery of tubing ~400-600ft below seabed
3	Remove Xmas Tree
4	Recover conductor and casings

The well intervention vessel to be used for the well abandonment operations may be a semi-submersible Mobile Offshore Drilling Unit (MODU) (see **Figure 10**) or a Light Well Intervention Vessel (LWIV) and a specific abandonment program will be developed for each well as part of the approval program under Section 8.5 of the Rules & Procedures Manual for Offshore Petroleum Production Operations. Any requirement for chemical usage/discharge will be detailed in a PUDAC application for each well.

Figure 10: Typical semi-submersible drilling rig (MODU)

Detailed procedures for abandonment of each well will be prepared during the detailed engineering phase of the project and will be used to inform the Well Work Safety Case to be submitted for approval to the CRU.

In addition, a Non-Production Safety Case (NPSC) will be submitted for the intervention vessel to be used i.e. MODU or LWIV. All well abandonment activities to be carried out during this phase will be subject to approval of the relevant Safety Cases by the CRU in accordance with Safety Case Guidelines.

The overall schedule for plug and abandonment of the subsea wells within the Seven Heads Lease is estimated at 78 days (including a 25% contingency).

6.3.2 Subsea Structures Removal

Seven Heads Manifold

Initially all tie-ins (pipe spools and umbilical jumpers) that are in the way of the lift, will be disconnected and removed. The associated concrete protection will also be removed.

Once all disconnections are made, the structures will be recovered to a vessel for onshore recycling/disposal. Lifting straps will be used for lifting to the vessel. The lifting straps will be put in place using an ROV, where possible, but a DSV with divers may be used.

The overall schedule for the lift of all subsea structures within the Seven Heads Lease (and associated spool pieces, umbilical jumpers and protection materials) and their transport to the disposal yard estimated at 71 days (including a 25% contingency).

6.4 Decommissioning Schedule

An indicative project programme for the entire KADP is shown in **Figure 11**. The final decommissioning project construction schedule will be completed once all decommissioning contracts have been awarded; where the timing of platform removal and subsea well abandonments may vary depending on availability of specialised marine construction and drilling vessels (crane barges, MODU's etc.).

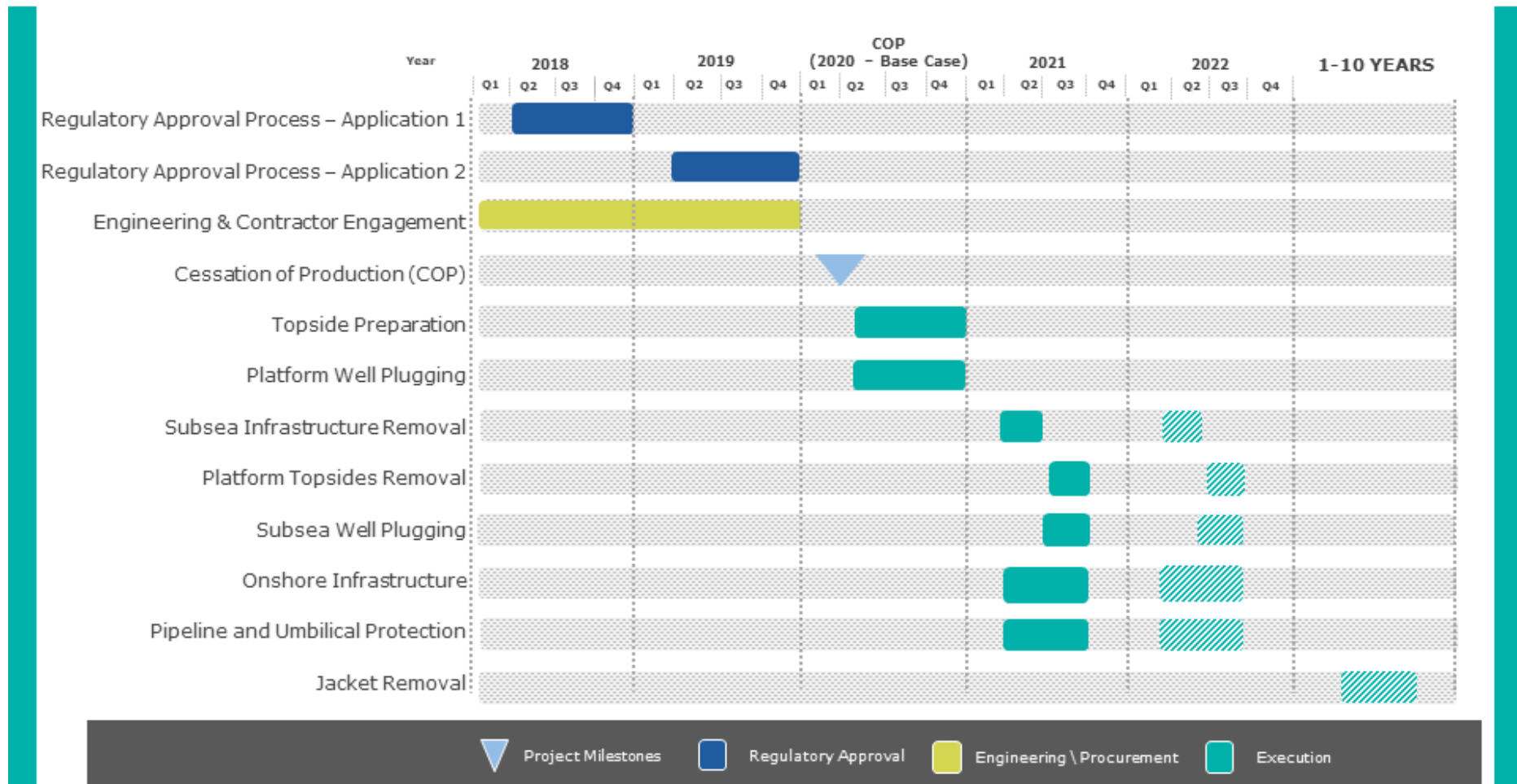
Post CoP, the subsea pipelines connecting the platforms to the onshore terminal and subsea wells will be displaced with seawater into the wells. Following this the platform well plug and abandonment will be completed in order to achieve hydrocarbon free status on the Kinsale Alpha and Bravo platforms. Upon completion of platform well P&A and subsea pipeline displacement activities, both Alpha and Bravo platforms are then available for removal operations.

A subsea programme of works to decommission all relevant subsea structures, including the removal of spool pieces, umbilical jumpers and protection materials, will be completed in advance of subsea well plug and abandonment activities. The Seven Heads works will be undertaken as part of an overall program which will include the other subsea fields in the area, i.e. Southwest Kinsale, Greensand and Ballycotton

There are other uncertainties which may affect the decommissioning schedule, including:

Marine vessel availability: the specialised vessels required, for example CSV's/DSV's, may not be available in the time windows planned, due to market conditions or over-runs on other projects; the contracting strategy will be flexible to allow for re-scheduling if required.

Weather: many of the key operations are weather sensitive, e.g. manifold lift, and the program may be delayed due to extreme weather conditions. The time estimates and durations used for planning purposes are based on historical performance data, and include some allowance for weather downtime, based on previous experience.

Figure 11: Indicative Project Schedule

Note: The actual timing of Cessation of Production will depend on field economics (gas prices) and facilities performance, currently anticipated between 2020 and 2021. The timing of activities may also vary depending on company strategy and availability of specialised marine vessels.

6.5 Materials and Waste Management

6.5.1 Waste Management Objectives

Kinsale Energy will follow the principles of the waste hierarchy for the KADP. Taking into account key resource and waste management policy and legislation and the likely waste generation from the relevant decommissioning activities, the resource and waste management objectives for KADP are as follows:

- Maximise reuse and recycling;
- Minimise disposal of waste to landfill; and
- Minimise environmental impacts of waste management.

6.5.2 Materials Generated

The following table summarised the approximate quantity of materials generated from each of the Seven Heads facilities covered by this Decommissioning Plan.

Table 9: Materials Generated

Material Type	Wells	Subsea Structures including spools, umbilical jumpers and protection materials
Steel	Total – 261 Te for all wells, assuming recovery of casings to 3m below seabed and relevant sections of production tubing.	SH Total – 232.5Te (SH Manifold and spools)
Concrete	N/A	SH – 1171Te (21Te Pipe spool Concrete Coating and 1150Te Concrete Mattresses)
Non-ferrous Metals	N/A	SH 0.12Te Anode
Asbestos	N/A	N/A
Other Hazardous Waste	Small quantities of: • Excess cement ; minimised through effective planning to only make required quantity (likely discharged offshore) • Cement and steel millings (likely discharged offshore)	N/A
Other Non-hazardous Wastes*	N/A	Umbilical quantities negligible (copper and LPP)
Total	261Te	1,403.62Te

6.5.3 Waste Management Strategy

The following sections summarise the strategy for each particular facility and their materials.

Pipeline Spools & Umbilical Jumpers

Pipeline spools, umbilicals and protective concrete mattress and grout bag materials will be removed for recycling or disposal where necessary to allow access to subsea structures.

Due to the high recyclability of steel, which is the dominant pipeline material, any pipeline spools which are removed will be recycled. It is anticipated that concrete could also have a high recyclability rate, with the protection materials to be recycled where possible and minimal disposal.

Subsea Structures

The subsea structures, including any concrete mattresses or grout bags surrounding each structure, will be removed and recycled or disposed. Due to the high recyclability of steel, which is the dominant subsea structure material (excluding protection blocks), the subsea structures will be recycled. It is anticipated that concrete should also have a high recyclability rate.

Wells

Wellhead and casing material and Subsea Xmas Trees will be removed and recycled or disposed.

6.5.4 Resource and Waste Management Plan

The decommissioning contractor will be responsible for developing and implementing appropriate procedures, securing the relevant authorisations and agreements to ensure appropriate management and disposal of waste and resources throughout the KADP. The Contractor will also be required to employ staff with skills, qualifications and experience appropriate to the needs of the works to be carried out during the KADP.

A detailed Resource and Waste Management Plan will be prepared by the contractors undertaking the decommissioning works on appointment. Their detailed Resource and Waste Management Plans will set out the following:

- Detailed analysis of the waste arisings/material surpluses including programmes and method statements to support detailed surveys where required;
- How the project resource and waste management objectives in this Decommissioning Plan will be achieved including proposed methods for reuse and recycling of wastes;
- The name, address and authorisation information of proposed recovery, recycling and disposal facilities which will be used for all wastes generated from the KADP;
- Proposals to educate the workforce and disseminate the Resource and Waste Management Plan to responsible staff member(s) for implementation; and
- Records that will be maintained relating to resource and waste management, including the identification of the records required to be kept, responsible staff member(s) for gathering and maintaining these records and the duration that these records will be maintained for.

The detailed plan prepared by the contractor will be submitted to KEL for their approval prior to commencement of the KADP. Written approval from KEL must be obtained prior to commencement of any decommissioning works. The contractor will be responsible for managing environmental issues through appropriate risk management, mitigation, auditing, licensing and monitoring and will be required to ensure compliance with legislative and commercial standards.

6.5.5 Waste Transportation

The contractor will be required to comply with the relevant legislation governing storage, transfer, treatment and disposal of all wastes and need to develop method statements and procedures for transporting waste as part of their detailed Resource and Waste Management Plan. Further, the contractor will be obligated to effectively manage waste streams throughout the decommissioning process and demonstrate their ability to deliver innovative recycling options in accordance with the principles of the waste hierarchy. Where feasible, wastes will be managed in Ireland, however it may be necessary to transfer wastes both within and outside the EU for reuse, recovery and/or disposal (particularly for the platform topsides and jackets).

Waste generated from the decommissioning works will be removed from the Kinsale fields and transported by vessels for dismantling prior to onshore reuse, recovery and/or disposal. The dismantling yard for the offshore infrastructure is yet to be selected, however, it will be an established yard, licenced for the recovery and/or disposal of decommissioned offshore structures where the dismantling, transport and disposal of materials represent an increment to ongoing activities.

Prior to the removal of any wastes, the contractor will put in place all relevant waste authorisations and permits required, and maintain a register of this information throughout the KADP. Authorisations may be required for the transfer of waste (waste carriers), any off-site waste management facilities (permitted or exempt sites) to which waste is taken to and any requirements for hazardous waste premises notification. All documentation will be retained and regularly updated (where required) by the contractor throughout the KADP.

All waste transfers will be undertaken by designated waste collection permit holders. The onshore waste facilities chosen by the contractor must demonstrate proven disposal track records and have appropriate licenses in place.

The trans-frontier shipment of waste to other EU countries will be subject to the TFS Regulations and relevant approvals will be obtained in advance from the National TFS Office at Dublin City Council. The trans-frontier shipment of waste to countries outside of the EU would also be subject to the Basel Convention and OECD Council Decision C(92)39/FINAL.

6.6 Health and Safety

6.6.1 KEL Health, Safety and Environment Risk Management System

In addition to the legislative basis set out above, and adhering to the OSPAR Convention requirement to protect the maritime area against the adverse effects of human activities, Kinsale Energy (as a wholly owned subsidiary of PETRONAS), operates a Health, Safety and Environment Management System (HSEMS) based on the requirements of internationally accepted standards for Environmental Management (ISO14001) and for Occupational Health and Safety (OHSAS18001).

Kinsale Energy's Health, Environment and Safety (HES) policy commits the company to take all reasonable and practical steps to prevent and eliminate risks of injuries, occupational illness, damage to property and the conservation of the environment. This policy is applicable to Kinsale Energy's activities and those of its contractors. All contractors must adhere to all Kinsale Energy HES policies and procedures.

The Kinsale Energy HSEMS is structured around 8 elements which are summarised below:

Leadership and Commitment: addresses top-down commitment and company culture necessary for success in the systematic management of HES.

Policy & Strategic Objectives: a written HES Policy is required as a minimum.

In setting strategic objectives and developing a HES Plan, management is required to consider the overall risk levels of its business activities taking into consideration the legal requirements, technological change, emerging issues and key stakeholders expectations.

Organisation, Responsibilities, Resources, Standards & Documents: addresses the organisation of people within Kinsale Energy, and the resources and documentation for sound and sustainable HES performance. Requires that the organisation and resources are adequate for its purpose, and that responsibilities for safety critical positions at all levels are clearly described, communicated and understood. It requires that staff based offshore are developed following structured competency assessment and training systems.

Hazards and Effects Management Process (HEMP): describes the identification of hazards and evaluation of HES risks for all activities, products and services, and the development of control and recovery measures to reduce HES risks to as low as reasonably practicable (ALARP).

Planning and Procedures: addresses asset integrity, procedures and work instructions, work permit system, management of change, contingency and emergency planning expectations, legislation compliance, process safety management, purchasing and procurement.

Implementation and Monitoring: addresses how activities are performed and monitored, and how corrective action is taken when necessary.

Audits: puts in place a programme to review and verify the effectiveness of the management system. It includes audits by independent auditors of processes or facilities.

Management Review: a formal process for management to review the effectiveness and suitability of the Management System in managing HES risks and ensuring continual improvements in HES performance. A management review occurs every 2 months at the HES Management Committee meeting.

6.6.2 Safety Case

In accordance with the requirements of the Petroleum Safety Framework, as established under the Petroleum (Exploration and Extraction) Safety Act 2010, and as amended by the Petroleum (Exploration and Extraction) Safety Act 2015, Kinsale Energy will develop a number of Safety Cases, as follows:

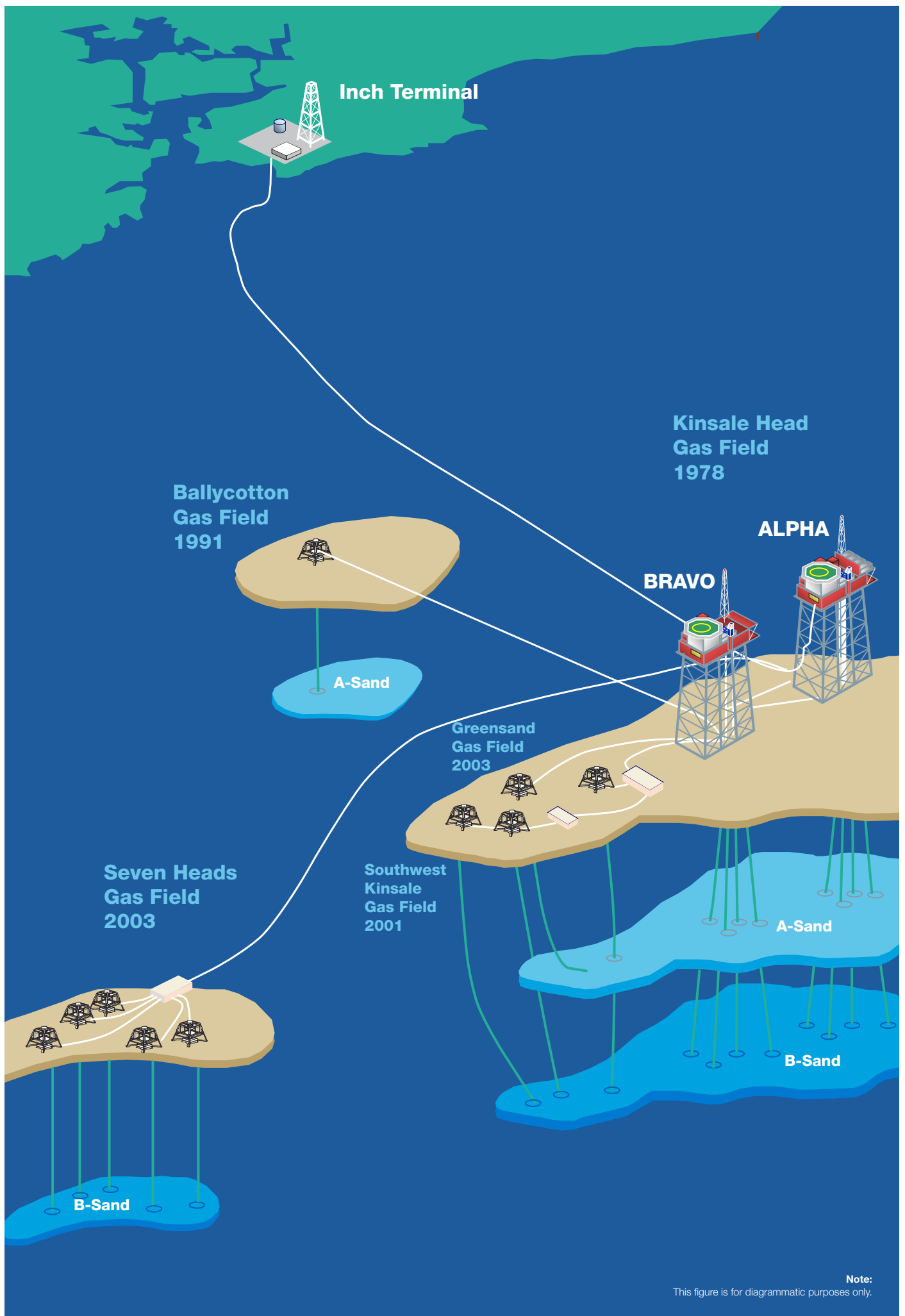
- Decommissioning Safety Case – covers platform based activities up to “hydrocarbon-free” status
- Well Work Safety Cases – covers all well abandonments
- Non-Production Installation Safety Case – covers well intervention vessels/drilling rigs (prepared by NPI Owner)

These Safety Cases will be submitted to the Commission for Regulation of Utilities (CRU) for approval. The CRU will issue a safety permit in respect of the designated petroleum activity, on acceptance of each of the Safety Cases. Safety Cases submitted to the CRU will be prepared in accordance with the Safety Case Guidelines, including CER/16/023 ‘Requirements of the Petroleum Safety Framework’, CER/16/024 ‘Safety Case Requirements’, CER/16/106 ‘ALARP Guidance’ and CER/16/016 ‘Compliance Assurance System’.

Each Safety Case shall demonstrate that the Kinsale Energy has carefully considered all available data in the planning of the proposed activities and that the risks associated with the design and execution of the activity have been reduced to ALARP.

Section 7

Post-Decommissioning Phase



Note:
This figure is for diagrammatic purposes only.

7 Post-Decommissioning Phase

7.1 Post Decommissioning Status

The Seven Heads Lease (Consent Application No.1) will result in all wells being plugged and abandoned and subsea structures being removed.

A consent application for the decommissioning of the remaining pipelines, umbilicals and associated protection material will be made in a second consent application to the Minister.

7.2 Post Decommissioning Survey

A post decommissioning survey will be carried out to ensure that no debris is left in place around the wells and subsea structures. Any significant debris found will be removed.

7.3 Decommissioning Close-out Report

A close out report will be submitted to the PAD within 6 months of completion of the offshore decommissioning scope covered by this Decommissioning Plan. The close out report will contain the following information:

- Confirmation of completion of decommissioning works included within this Decommissioning Plan.
- Details of the decommissioning works undertaken including:
 - Equipment & vessels used,
 - Materials used,
 - Construction drawings, and
 - An explanation of any variations (approved during the works) to the original approved Decommissioning Plan.
- Details of resource and waste management undertaken.
- Verification/Survey Reports to confirm everything completed in accordance with the Decommissioning Plan

7.4 Residual Liability

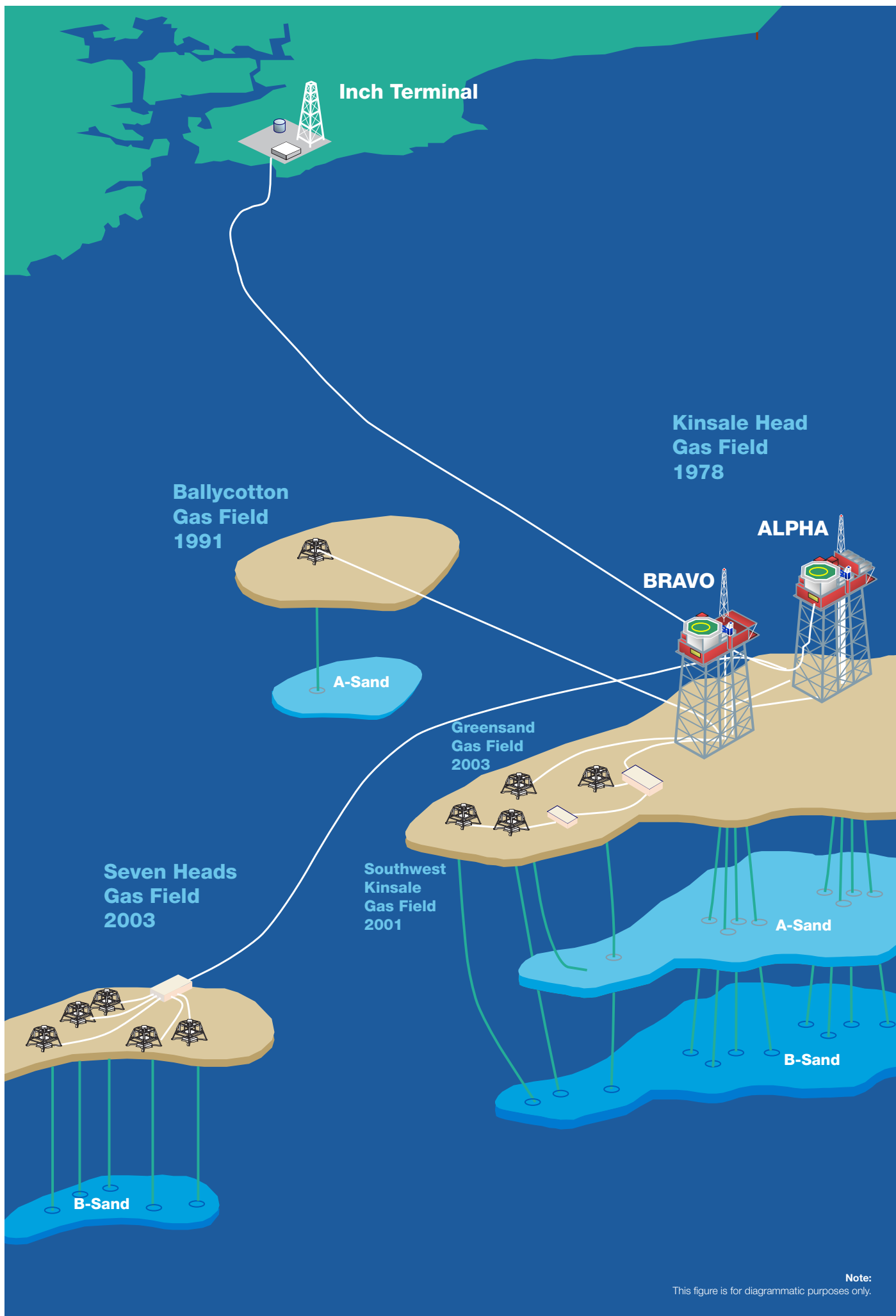
This is not applicable to the facilities associated with this Decommissioning Plan as no facilities will be left in place.

7.5 Post Decommissioning Monitoring

No decommissioning monitoring is proposed for this Decommissioning Plan as no facilities will be left in place.

Section 8

Environmental Assessment



8 Environmental Assessment

An Environmental Impact Assessment Report (EIAR) has been prepared for the KADP to provide the necessary environmental appraisal information to enable the Competent Authority, in this case the Minister for Communications, Climate Action & Environment to undertake an Environmental Impact Assessment (EIA) for the decommissioning of the Kinsale Area facilities.

A single EIAR has been prepared for the entire KADP project. This includes the facilities associated with this Decommissioning Plan.

The following summarises the key points of the EIAR.

8.1 Environmental Baseline and Sensitivity

Since 2002, there have been a series of seabed baseline and monitoring surveys undertaken in the Kinsale Area associated with exploration wells, field and pipeline developments and operations. Together with geophysical mapping undertaken as part of rig site and pipeline route surveys, and seabed survey undertaken in 2017 for the KADP, these surveys provide a good understanding of the seabed topography, sediments and their dynamics, fauna and contaminant status.

Section 4 and 5 of the EIAR details the environmental baseline for the terrestrial and offshore Kinsale Area and its sensitivity.

8.2 Environmental Assessment Methodology and Identification of Potentially Significant Effects

Effects which could arise from the activities associated with the KADP were identified on the basis of the nature of the project (including its location, physical and operational characteristics, residues, emissions and wastes), considered against the description of the offshore and terrestrial environment, and the understanding of impact pathways from a range of sources, including:

- Regional and site specific environmental data, including a pre-decommissioning environmental survey carried out in May 2017, and a site walkover at the Inch terminal site in June 2017
- Typical vessel specifications (e.g. for support, heavy lifts and rock placement)
- Estimates of materials and wastes arising from the decommissioning work
- Decommissioning planning studies and indicative information provided by decommissioning contractors and engineering consultants
- Typical drilling rig and vessel specifications
- Experience of relevant aspects and operations of analogous projects in the Celtic Sea, Irish Sea, North Sea and elsewhere
- Peer reviewed scientific papers describing the effects of specific and analogous interactions
- Other publicly available “grey” literature
- The Irish Offshore Strategic Environmental Assessment (IOSEA) 4 Environmental Report and Irish Offshore Strategic Environmental Assessment (IOSEA) 5 Environmental Report
- Conservation site designations, potential designations, and site advice etc. where relevant
- Applicable legislation, guidance and policies

- An number of EIAR workshops involving Kinsale Energy and the report authors
- Input to the EIA process through consultation with relevant stakeholders.

Potential effects of the KADP were identified on the basis of defined severity criteria, and allow for the consideration of effect likelihood, scale and frequency. The identification of potential effects (positive or negative) also considered those which are direct and indirect, which could lead to cumulative or transboundary effects, as well as their likely duration.

Potential effects were identified against a range of relevant environmental receptors within the broad environmental factors which must be considered under the EIA Directive, namely: population and human health; biodiversity, with particular attention to species and habitats protected under Directive 92/43/EEC and Directive 2009/147/EC; land, soil, water, air and climate; material assets, cultural heritage and the landscape; and interaction between the factors. Additionally, effects from the vulnerability of the project to risks of major accidents and/or disasters were also considered.

Potentially Significant Environmental Effects to be Considered Further

A number of environmental effects were identified as being of potential significance and/or with potentially moderate or more severe impacts. Those decommissioning activities identified to likely, directly or indirectly, affect one or more relevant environmental factors have been grouped together by major source of effect as summarised in **Table 10** below. These potential effects are considered in **Section 7** of the EIAR.

Table 10: Summary of potential significant environmental effects

Source of Potential Significant Effect	Activity	Relevant Environmental Factor				
		Population and human health	Biodiversity	Land, soil, water, air and climate;	Material assets, cultural heritage and the landscape;	interaction between the factors r
Consent Application 1						
Physical presence: decommissioning operations	Physical presence in field and in transit of supply vessels, barge/or heavy lift vessels and drilling rig	✓	✓		✓	
Physical disturbance	Drill rig positioning and vessel anchoring. Mattress removal, cutting of spool pieces and umbilical jumpers and their subsequent removal. Removal of manifolds and wellheads.		✓	✓	✓	✓
Underwater noise	Mechanical cutting well conductors and removal of well surface casings. Rig and vessel noise.		✓			✓
Discharges to sea	Cementing and other chemicals associated with well abandonment operations. Hydraulic fluid release during umbilical cutting.		✓	✓		

Source of Potential Significant Effect	Activity	Relevant Environmental Factor				
		Population and human health	Biodiversity	Land, soil, water, air and climate;	Material assets, cultural heritage and the landscape;	interaction between the factors
Energy use and atmospheric emissions	Power generation (rig and vessel) Materials recycling			✓	✓	✓
Waste: materials recycling, reuse and disposal	Solid and liquid wastes to shore Removal of hazardous materials Materials recycling Onshore waste treatment, landfill of residual waste/materials Offloading and storage/dismantling of offshore structures onshore Road transport Hazardous material handling.	✓		✓	✓	
Accidental events	Dropped objects Vessel collision risk Accidental spills of fuel/lubricants.	✓	✓	✓	✓	✓
Consent Application 2						
Physical presence: decommissioning operations	Physical presence in field and in transit of supply vessels, barge/ or heavy lift vessels.	✓	✓		✓	
Physical presence: legacy materials (left in situ)	Presence of pipeline, umbilicals and protection materials post decommissioning	✓			✓	
Physical disturbance	Vessel anchoring. Excavation of jacket piles/leg stump remediation and removal of jacket. Recovery of large items of debris from the seabed. Remedial rock placement at jacket and pipelines.		✓	✓	✓	✓
Underwater noise	Mechanical cutting of jacket legs and structural members. Vessels, including rock placement. Post-decommissioning survey.		✓			✓
Discharges to sea	Release of inhibited water from export pipelines.			✓		
Energy use and atmospheric emissions	Materials recycling			✓	✓	✓

Source of Potential Significant Effect	Activity	Relevant Environmental Factor				
		Population and human health	Biodiversity	Land, soil, water, air and climate;	Material assets, cultural heritage and the landscape;	interaction between the factors
Waste: materials recycling, reuse and disposal	Offloading and storage/dismantling of offshore structures onshore Road transport. Materials recycling Onshore waste treatment Landfill of residual waste/materials.	✓			✓	
Accidental events	Dropped objects Accidental spills of fuel/lubricants and chemical spills.	✓	✓	✓	✓	✓

A consideration of KADP activities or issues judged to have positive, minor or negligible environmental effects is given in **Appendix D of the EIAR**.

8.3 Management of Residual Effects and Conclusions

Through a systematic evaluation of the activities relating to the proposed KADP and their interactions with the environment, a variety of environmental effects were identified, the majority of which were of limited extent and duration and considered minor. Those activities identified as being of potentially greater concern were described and assessed further in the EIAR.

A number of potential effects are mitigated through mandatory requirements (e.g. as required by legislation) and project scope of works (e.g. rock placement on pipelines remaining *in situ*). Such mandatory control measures and additional mitigation measures identified are listed in **Table 11**, and will be included in detailed design and final project planning and execution.

These are fully detailed in the EIAR, Section 8.

Table 11: Summary of commitments and actions

Issue	Action
<u>Environmental Management Commitments</u>	
Compliance assurance	Ensure management of the applications for and monitoring of compliance with the requirements of project environmental permits and consents.
Procurement	Ensure requirement to meet MARPOL standards for special areas included in procurement of vessels and rigs used in decommissioning operations.
Contractor management	All vessels and the rig to be used during decommissioning will be subject to audit. Contractor performance will be monitored throughout the decommissioning operations

Issue	Action
Activity planning	Wherever possible, seek to minimise vessel days by making use of vessel synergies and careful activity phasing.
Interaction with other users: decommissioning operations	Notices to Mariners will be issued to cover all phases of decommissioning work to communicate the nature and timing of the activities. All vessels used in the decommissioning operations will meet applicable national and international standards (e.g. in terms of signals and lighting) and would follow established routes to ports. Should the jackets be placed in "lighthouse mode" for a period of time following topside removal, navigational aids of a type agreed with the Commissioner of Irish Lights will be deployed. Consult will take place with fisheries organisations and relevant marine authorities in accordance with legislation.
Discharges to sea:	Ensure chemical risk assessment is undertaken as part of final well decommissioning chemical selection and apply for relevant chemical permits (Permit for Use and Discharge of Added Chemicals – PUDAC).
Waste production	Implement a detailed Resource and Waste Management Plan which maximises the potential for reuse and recycling, including source segregating waste where appropriate. Management of all waste will be undertaken in accordance with the relevant waste legislation and only permitted and licensed waste facilities will be used.
Atmospheric emissions	As part of the decommissioning waste management plan (above), the benefit of materials returned to shore will be maximized through preferential reuse and recycling wherever possible.
Accidental events: Seabed debris from dropped objects	All lifting operations will be risk assessed.
Accidental events: loss of diesel inventories	Undertake audit of vessel bunkering procedures. Bunkering to be conducted in favourable sea states and during daylight hours so far as practicable. Procedure to be agreed with DTTAS.
Mitigation measures and residual effects	
Interaction with other users: decommissioning operations	Guard vessels will be used to minimise the potential for interaction between decommissioning vessels and other users. Residual effect: <i>The use of guard vessels would reduce the risk of other user interaction with certain activities associated with the decommissioning project (e.g. heavy lifts). Noting that these would take place in existing and charted surface exclusion zones, with all vessels subject to mandatory lighting and marking controls, the addition of a guard vessel will result in a minor risk reduction to other users. The residual impact from interactions with other users is temporary and minor.</i>
Interaction with other users: legacy materials left <i>in situ</i>	Rock cover remediation will be used to mitigate the potential snagging risk associated with decommissioning pipelines and umbilicals <i>in situ</i>, and the rock will be designed to be overtrawlable. Residual effect: <i>On application of rock cover following removal of exclusion zones around relevant infrastructure, there remains a low risk to other users (primarily fishing) from interactions with pipelines and umbilicals. The option to rock cover all exposed pipeline sections would further reduce risks to third parties.</i> Pipelines and umbilicals will be surveyed post-decommissioning to establish their exact position and this information will be included into navigational charts

Issue	Action
	Residual effect: <i>The post-decommissioning survey will confirm/update the position of the pipelines and umbilicals and inform any update to their charted location to ensure other users are aware of their accurate position, and therefore contribute to risk reduction from interaction.</i>
Physical disturbance: sensitive seabed features	The minimisation of rig and vessel movements which require anchoring, and the use of dynamic positioning (DP) on most vessels, where practicable (note that sensitive features (e.g. wrecks, Annex I habitats) have not been recorded in previous surveys within the working area). Pipeline decommissioning options (rock placement) which minimise physical disturbance will be selected subject to wider environmental, safety, technical and economic considerations. For each option involving rock placement, efforts will be made to minimise the volume of rock deployed.
	Residual effect: <i>The measures have the potential to reduce the significance of effect by minimising seabed footprint of activities. The predicted effect of seabed disturbance is negligible and short-term.</i>

8.3.1 Conclusion

The overall conclusion of the Environmental Impact Assessment Report is that, in view of the predicted scale, intensity and duration of the activities, with the implementation of the proposed mitigation and risk reduction measures and commitments in **Table 11**, the KADP will not result in significant adverse effects on the environment, other users, or population and human health.

8.4 Conclusions of the Appropriate Assessment Screening

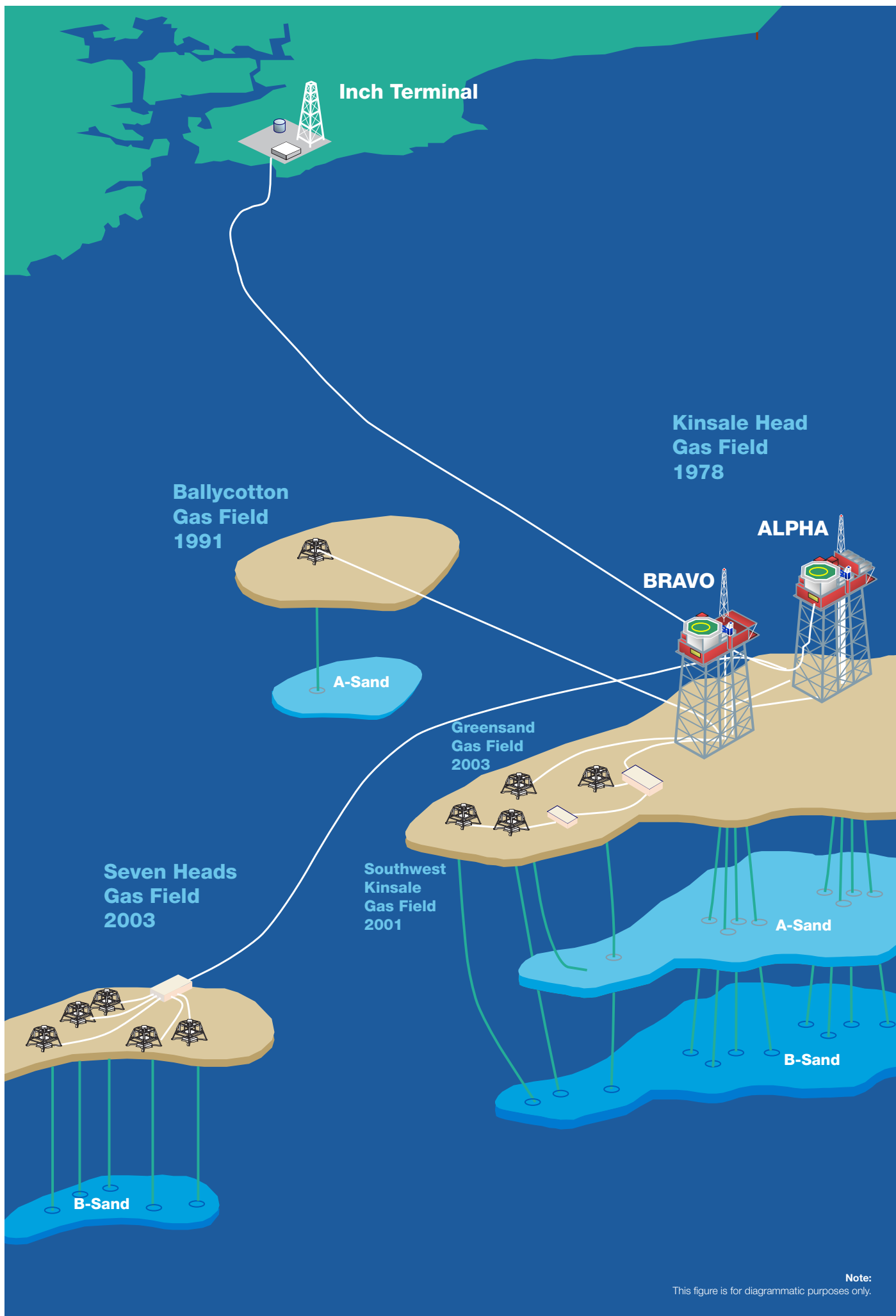
A separate Appropriate Assessment Screening Report (reference, 253993-REP-14) has been prepared for the entire KADP to provide the necessary information required by the consenting authority, the Minister, to undertake screening (Stage 1) to determine if a full Appropriate Assessment of the decommissioning of the Kinsale Area gas fields and facilities is required.

The report concludes that the site of the proposed project is not directly connected with or necessary to the management of any Natura 2000 sites.

The screening assessment identified 13 SACs and 15 SPAs within approximately 100km of the proposed project. Based on the information provided above, and by applying the precautionary principle, it is determined that it is possible to rule out likely significant impacts on the integrity of any Natura 2000 site and therefore it is not deemed necessary to undertake any further stage of the Appropriate Assessment process.

Section 9

Stakeholder Engagement



Note:
This figure is for diagrammatic purposes only.

9 Stakeholder Engagement

9.1 Introduction

A systematic, documented process has been put in place to manage the stakeholder consultation requirements and we have set out below our approach to this process.

The overarching approach that has been adopted for stakeholder management on the project is as follows:

- Any party outside of the project participants are considered a stakeholder.
- All stakeholders will be consulted with and updated on the project as appropriate
- Ensure stakeholders have had the opportunity to input into the project as appropriate

To achieve the above:

- A stakeholder manager has been nominated for the project. Their role is to:
 - co-ordinate stakeholder communications, and
 - maintain a register of all stakeholder communications.
- A live stakeholder register is being maintained and which records historic and planned stakeholder engagement and communications.
- The register will be maintained throughout the development of the project.

9.2 Stakeholder Engagement Activities

During the preparation of this Decommissioning Plan and associated EIAR, discussions were had and/or correspondence made with statutory and non-statutory bodies and other interested parties in order to ensure that issues relating to the proposed KADP were addressed. The parties consulted include the following:

- Petroleum Affairs Division (PAD) - Department of Communications, Climate Action and Environment,
- Commission for Regulation of Utilities (CRU),
- Marine Planning and Foreshore Unit – Department of Housing, Planning and Local Government,
- Cork County Council,
- National TFS (Trans Frontier Shipments) Office, Dublin City Council,
- National Parks and Wildlife Service (NPWS),
- National
- Monuments (NM),
- Ervia,
- Gas Networks Ireland (GNI),
- ESB,
- Cork Port Operations,
- Naval Operations (Cork),
- South West Regional Fisheries Forum,

- South East Regional Fisheries Forum,
- Birdwatch Ireland,
- Irish Whale and Dolphin Group (IWDG),
- Cork City Council,
- TDs and local councillors.

For a full list of consultees, please refer to Appendix F of the EIAR.

A consultation response was received from the Irish Whale and Dolphin Group (IWDG) noting the need to ensure that the decommissioning works will not disturb or degrade the marine habitat for cetaceans.

The proposed decommissioning scope of work and the environmental assessment has had due regard to the concerns regarding the protection of cetaceans and ensures that potential adverse effects are minimised.

A written response was also received from Dublin Airport Authority (DAA) stating that DAA has no observations to make on the KADP.

A meeting was held between Kinsale Energy, Arup/Hartley Anderson and NPWS during the consultation process. At this meeting Kinsale Energy outlined the proposed decommissioning project as well as detailing the methodology being used to assess ecological impacts and impacts on Natura 2000 sites. NPWS requested that the following was also considered:

- To consult with the IWDG for data on cetaceans.
- To consider the Marine Institute's Fisheries Ecosystems Advisory Services (FEAS) survey data, in particular marine mammal and seabird observations made during the Celtic Sea herring and ground fish surveys.

Subsequent to the meeting, useful information was obtained from both the IWDG and FEAS publications which has been reflected in the KADP EIAR.

A response was also received from the National Monuments Service of the Department of Culture, Heritage and the Gaeltacht regarding the underwater archaeology assessment. The environmental assessment has had due regard to underwater archaeology.

In addition to the above, two public consultation sessions were undertaken with invitations made to all key stakeholders and interested members of the local community. The first information session took place at the Clayton Hotel, Cork City On 18th April 2018. An advertisement was placed in the local newspapers and letters sent to key stakeholders. The second public information session was hosted in the Aghada Community Centre, East Cork on 19th April 2018. This was arranged to facilitate residents living in the area of the onshore Inch terminal. Letters of invitation were individually delivered to residents in the Inch area in advance of the information session.

Both public information sessions were well received, with a total attendance of 45 people across both sessions. Feedback received from stakeholders has been positive and will be monitored and managed for the duration of the project.

9.3 Further Stakeholder Engagement

Stakeholder management will continue throughout the decommissioning works and may extend beyond completion, if there are any long term monitoring or maintenance requirements imposed as conditions of the consents (refer to **Section 7**).

Taking into consideration the stakeholder consultation which has been completed as part of the preparation of the Decommissioning Plan (refer to **Section 9.2**), the following stakeholders are included on Kinsale Energy's

current stakeholder register as requiring further consultation prior to, during and/or following the decommissioning works:

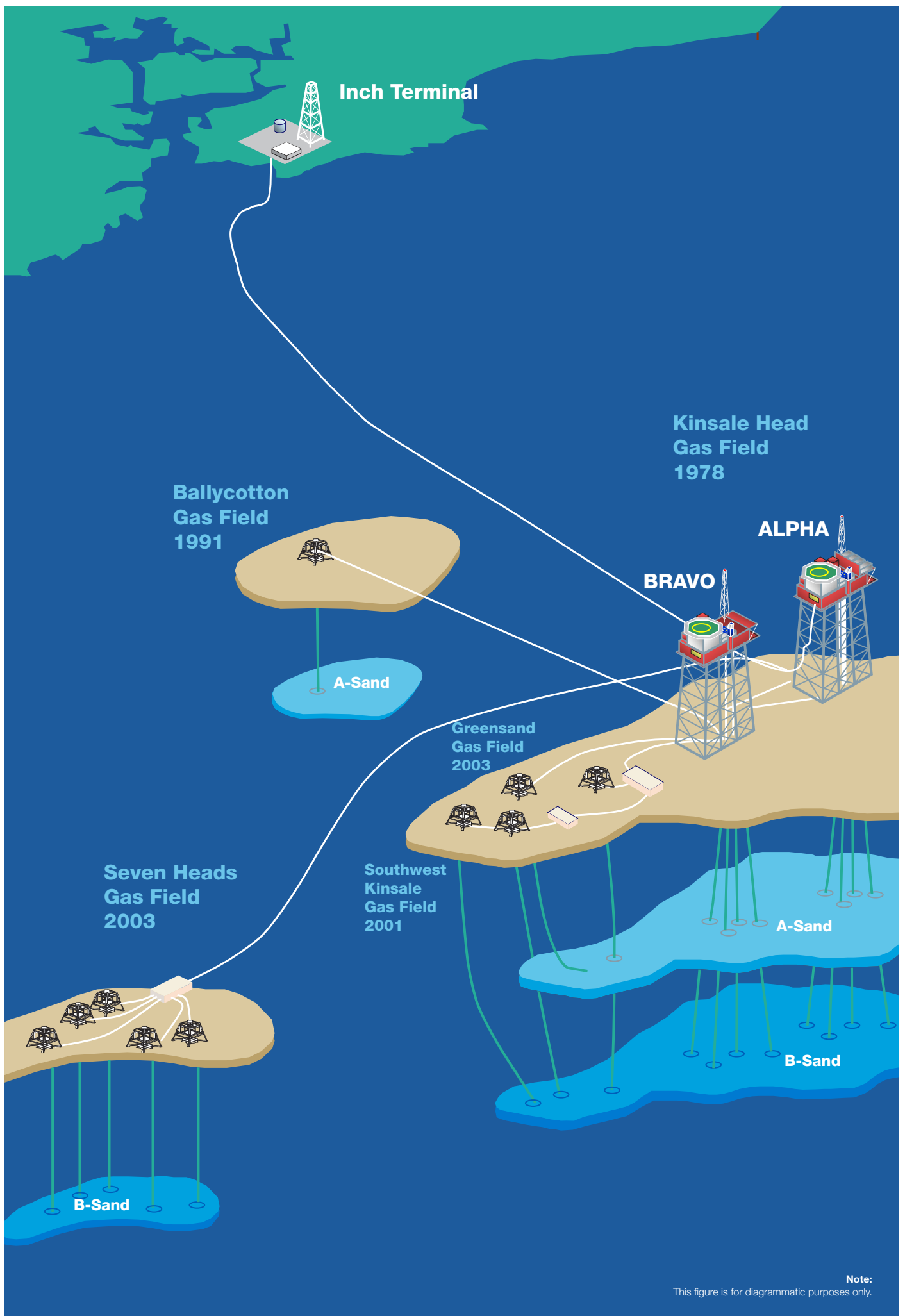
- Petroleum Affairs Division (PAD) - DCCAE
- Commission for Regulation of Utilities (CRU)
- Gas Networks Ireland/Ervia
- Marine Planning and Foreshore Unit - DHPLG
- Cork County Council
- TFS Office, Dublin City Council
- NPWS & National Monuments - DAU - DAHRRG
- The Irish Coast Guard (IRCG)
- Irish Maritime Operations Centre (NMOC) of the Irish Coast Guard - (Marine Rescue Co-Ordination Centre (MRCC) of the Irish Coast Guard)
- Marine Radio Affairs Unit of the Maritime Safety Directorate
- Maritime Safety Policy Division of the Maritime Safety Directorate
- Ship Source Pollution Prevention Unit Irish Maritime Administration (Formerly - Marine Environmental Division of the Maritime Safety Directorate)
- Marine Institute
- Commissioners of Irish Lights (CIL)
- Naval Operations – Department of Defence
- Cork Port Operations
- Environmental Protection Agency
- RNLI Ballycotton
- Sea Fisheries Protection Authority
- Sea Fisheries Policy Division
- South & West Fishermen's Organisation
- Irish South & West Fish Producer Organisation (IS&WFPO)
- Irish South & East Fish Producer Organisation (IS&EFPO)
- South West Regional Fisheries Forum / (Regional Inshore Fisheries Forum)
- South East Regional Fisheries Forum / (Regional Inshore Fisheries Forum)
- National Inshore Fisheries Forum (NIFF)
- Irish Fish Producers Organisation (IFPO)
- Bord Iascaigh Mhara
- Irish Fish Producers Organisation
- Irish Whale and Dolphin Group
- Birdwatch Ireland
- Landowners of onshore pipeline & wayleave
- Swell Surf School - Inch
- Local Residents – Inch
- General Public

Appendix A

Further Information

Appendix A1

Relevant International Conventions and European Legislation



Note:
This figure is for diagrammatic purposes only.

A1.1 Relevant International Conventions and European Legislation

Table A1 below summarises the key international conventions and European legislation relevant to the KADP. **Section A1.2** and **Section A1.3** provide further detail.

Table A1: Key International legislation relevant to the KADP

Relevant Legislation	Consents / requirements for Decommissioning
OSPAR Convention (1992)	The KADP shall take all possible steps to prevent and eliminate pollution and apply the necessary measures to protect the maritime area against the adverse effects of human activities during works. Under paragraph 2 of the Decisions 98/3, the dumping, and leaving wholly or partly in place, of disused offshore installations is prohibited within the OSPAR maritime area – Kinsale Area platforms and subsea structures to be removed as part of the KADP.
MARPOL Convention, International Maritime Organisation (1978)	Ireland ratified the Convention, the requirements of which are transposed in Sea Pollution Act, 1991 (No. 27 of 1991). The Convention will apply to all shipping operations associated with the KADP ensure the prevention of pollution of the marine environment.
UN Convention on the Law of the Sea (1982)	The Convention will apply to the granting by the competent authority of an authorisation for the KADP.
Basel Convention	Any waste generated by the KADP, which has to be exported from Ireland, will be subject to the Convention.
Espoo Convention	Assessment required of the potential for the proposed activity to result in significant transboundary effects.
OECD Decision on the Control of Transboundary Movements of Waste	Any waste generated by the KADP, which will be exported from Ireland, will be subject to the OECD Decision.
Ballast Water Convention	All vessels associated with the KADP are required to manage their ballast water and sediments to a certain standard, according to a ship-specific ballast water management plan. All ships vessels also have to carry a ballast water record book and an international ballast water management certificate.
Water Framework Directive (2000/60/EC)	The Water Framework Directive, EC (2000), sets the objectives for water protection for the future and applies to inland surface waters, groundwater, transitional waters and coastal waters. Most of the KADP activities will be located outside 'coastal waters', as defined in the Directive. The Directive requirements will apply only to near shore and onshore decommissioning activities.
Marine Strategy Framework Directive (2008/56/EC)	The Directive aims to achieve good environmental status for the EU's marine waters by 2020 and to protect the resource base upon which marine-related economic and social activities depend. Most of the KADP activities will be located within the marine area, to which the Directive applies. The Directive requirements will apply to KADP activities.
Waste Framework Directive (2008/98/EC)	Waste activities arising from the KADP must comply with the Directive.

Relevant Legislation	Consents / requirements for Decommissioning
Commission Decision 2000/532/EC on the list of wastes, as amended by Commission Decision 2014/955/EU	Waste, arising from the KADP, must be classified in accordance with the Decision.
Regulation (EC) No 1013/2006 on Shipments of Waste	The management of waste, arising from the KADP, must comply with the requirements of the Regulation.
Aarhus Convention (Convention on Access to Information, Public Participation in Decision Making and Access to Justice in Environmental Matters) (1998)	The relevant requirements of the Aarhus Convention, in relation to public participation in decision making on environmental matters, have been incorporated into the EIA Directive 2011/92/EU.

A1.2 Relevant International Conventions

MARPOL Convention

MARPOL Convention, International Maritime Organisation (1978), is the main international convention covering prevention of pollution of the marine environment. It was developed in an effort to minimise pollution of the oceans and seas and to preserve the marine environment. Its aim is to eliminate planned discharge of pollutants to the marine environment and to minimise accidental spillage of deleterious substances.

The MARPOL Protocol was developed and adopted in 1978 in response to a number of tanker accidents in 1976 and 1977. As the 1973 Convention had not yet entered into force, the 1978 Protocol absorbed the parent Convention. It entered into force in 1983 and was updated by amendments over the years. In 1997, a new Protocol was adopted to amend the Convention and a new Annex VI added.

The Convention includes regulations aimed at preventing and minimising pollution from ships - both accidental pollution and that from routine operations - and currently includes six technical Annexes.

Ireland ratified the Convention, the requirements of which are transposed in Sea Pollution Act, 1991 (No. 27 of 1991).

The Convention will apply to all shipping operations associated with the KADP.

UN Convention on the Law of the Sea (1982)

The UN Convention on the Law of the Sea (UNCLOS), UN (1982), defines the exclusive economic zone (not greater than 200 nautical miles from the low water mark) where the rights and jurisdiction of the coastal State are governed by the Convention. Within the exclusive economic zone, the convention gives a State the sovereign right to the exploitation of resources and exclusive jurisdiction over authorisation and regulation of any installations or structures (refer to Article 56, paragraph 1(a) and 1(b) and Article 60, paragraph 1 and 2).

Article 193 of UNCLOS further references the granting of exclusive rights to Coastal States to explore and exploit the natural (non-living) resources and states the following with regard to environmental protection:

“States have the sovereign right to exploit their natural resources pursuant to their environmental policies and in accordance with their duty to protect and preserve the marine environment”.

With regard to disused installations or structures, Article 60, paragraph 3, states the following:

“Any installations or structures which are abandoned or disused shall be removed to ensure safety of navigation, taking into account any generally accepted international standards established in this regard by the competent international organization [such as the International Maritime Organisation (IMO)]. Such removal shall also have due regard to fishing, the protection of the marine environment and the rights and duties of other States. Appropriate publicity shall be given to the depth, position and dimensions of any installations or structures not entirely removed”.

The ambiguity between the requirement to remove abandoned or disused installations and reference to publicity for structures not entirely removed has led to debate and different interpretations of the decommissioning requirements of UNCLOS.

UNCLOS also makes provision for the protection and preservation of the marine environment (Part XII, Articles 192 to 237 inclusive).

Coastal states are obliged to adopt national laws and take measures to prevent, reduce and control pollution of the marine environment, arising from, or in connection with, the exploration or exploitation of the natural resources of the seabed and subsoil, and from dumping within their jurisdiction.

A number of other articles are relevant to the proposed KADP, including the following:

- Article 194 – Measures to Prevent, Reduce and Control Pollution of the Marine Environment.
- Article 206 – Assessment of Potential Effects of Activities.
- Article 208 – Pollution from seabed activities subject to national jurisdiction
- Article 210 – Pollution by Dumping.
- Article 214 – Enforcement with respect to pollution from seabed activities.

Ireland and the European Union have ratified the Convention.

The Convention will apply to the granting by the competent authority of an authorisation for the KADP.

Basel Convention (1989)

The Basel Convention, UN (1989), is a comprehensive global environmental agreement on the management of hazardous and other wastes. The Convention aims to protect human health and the environment against the adverse effects resulting from the generation, management, transboundary movement and disposal of hazardous and other wastes. The Basel Convention was adopted in 1989 and entered into force in 1992. Ireland has ratified the Convention.

The Convention regulates the transboundary movements of hazardous and other wastes by applying the “Prior Informed Consent” procedure (shipments made without consent are illegal). The Convention obliges its Parties to ensure that hazardous and other wastes are managed and disposed of in an environmentally sound manner. To this end, Parties are expected to minimise the quantities that are moved across borders, to treat and dispose of wastes as close as possible to their place of generation, and to prevent or minimise the generation of wastes at source. Strong controls have to be applied from the moment of generation of a hazardous waste to its storage, transport, treatment, reuse, recycling, recovery and final disposal.

In 1995, an amendment to the Basel Convention (“the Ban Amendment”) was adopted. The amendment provided for the prohibition of:

- All transboundary movements to States, which are not included in Annex VII, of hazardous wastes covered by the Convention that are intended for final disposal, and
- All transboundary movements to States, which are not included in Annex VII, of hazardous wastes covered by paragraph 1 (a) of Article 1 of the Convention that are destined for reuse, recycling or recovery operations.

In 1998, Annexes VIII and IX were added to provide further elaboration as to the wastes regulated by the Convention as listed in Annexes I and III. Since then, various changes to these Annexes VIII and IX have also been adopted.

The Basel Convention has been implemented in European Union and Irish legislation.

Any waste generated by the KADP, which has to be exported from Ireland, will be subject to the Convention.

Espoo Convention (Convention on Environmental impact Assessment in a Transboundary Context) (1991)

Ireland is a Contracting Party to the Convention on Environmental Impact Assessment in a Transboundary Context (Espoo 1991) and thus an assessment is needed of the potential for the proposed activity to result in significant transboundary effects. The relevant requirements of the Espoo Convention, in relation to the environmental assessment of transboundary effects, have been incorporated into the EIA Directive 2011/92/EU.

OECD Decision on the Control of Transboundary Movements of Waste

Since March 1992, transboundary movements of wastes destined for recovery operations between member countries of the Organisation for Economic Co-operation and Development (OECD) have been supervised and controlled according to Decision C(92)39 on the Control of Transfrontier Movements of Wastes, OECD (1992). The 1992 decision was revised in 2001 and amended in 2002, 2004, 2005 and 2008, OECD (2001). The OECD Decision provided a framework for the OECD member countries to control transboundary movements of recoverable wastes within the OECD area in an environmentally sound and economically efficient manner. Compared to the Basel Convention, it gave a simplified and more explicit means of controlling such movements of wastes. It also facilitated transboundary movements of recoverable wastes between OECD member countries in the case where an OECD member country is not a Party to the Basel Convention.

The OECD Decision includes lists of wastes, which have been harmonised to a large extent with the lists of wastes of the Basel Convention.

Ireland is a member of the OECD. OECD Council Decisions are legally binding for member countries.

Any waste generated by the KADP, which will be exported from Ireland, will be subject to the OECD Decision.

OSPAR Convention (1992)

The OSPAR Convention, OSPAR (1992), is the current legislative instrument regulating international cooperation on environmental protection in the North-East Atlantic. It replaces the 1972 Oslo Convention on dumping waste at sea and the 1974 Paris Convention on land-based sources of marine pollution. Ireland has ratified the Convention.

The Convention applies to the internal waters and the territorial seas of the Contracting Parties, the sea beyond and adjacent to the territorial sea under the jurisdiction of the coastal State to the extent recognised by international law, and to the high seas, including the bed of all those waters and its subsoil, situated within specified limits of the Atlantic and Arctic Oceans.

The convention requires all parties to take all possible steps to prevent and eliminate pollution and apply the necessary measures to protect the maritime area against the adverse effects of human activities so as to safeguard human health and to conserve maritime ecosystems and, when practicable, restore marine areas which have been adversely affected. Parties are required to, individually and jointly, adopt programmes and measures and to harmonise policies and strategies.

In addition, in order to meet their obligations, Article 2, paragraph 2(a) and 2(b) states that Parties to the Convention must apply the following two principles:

- *“the precautionary principle, by virtue of which preventive measures are to be taken when there are reasonable grounds for concern that substances or energy introduced, directly or indirectly, into the marine environment may bring about hazards to human health, harm living resources and marine ecosystems, damage amenities or interfere with other legitimate uses*

of the sea, even when there is no conclusive evidence of a causal relationship between the inputs and the effects;

- *the polluter pays principle, by virtue of which the costs of pollution prevention, control and reduction measures are to be borne by the polluter."*

Annex II of the convention, which specifically addresses the prevention and elimination of pollution by dumping or incineration, states that *"No disused offshore installation or disused offshore pipeline shall be dumped and no disused offshore installation shall be left wholly or partly in place in the maritime area without a permit issued by the competent authority"* (Article 5, paragraph 1). The Annex further states that such permits shall not be issued if substances, which are likely to represent a hazard, are present (paragraph 2).

Article 8 of Annex II reinforces this, stating that *"No placement of a disused offshore installation or a disused offshore pipeline in the maritime area for a purpose other than that for which it was originally designed or constructed shall take place without authorisation or regulation by the competent authority of the relevant Contracting Party"*.

For the purposes of the convention 'dumping' and 'wastes or other matter' are defined as follows:

Article 1 – Definitions

"(f) "Dumping" means

- (i) any deliberate disposal in the maritime area of wastes or other matter*

- (1) from vessels or aircraft;*

- (2) from offshore installations;*

- (ii) any deliberate disposal in the maritime area of*

- (1) vessels or aircraft;*

- (2) offshore installations and offshore pipelines."*

"(g) "Dumping" does not include:

- (i) the disposal in accordance with the International Convention for the Prevention of Pollution from Ships, 1973, as modified by the Protocol of 1978 relating thereto, or other applicable international law, of wastes or other matter incidental to, or derived from, the normal operations of vessels or aircraft or offshore installations other than wastes or other matter transported by or to vessels or aircraft or offshore installations for the purpose of disposal of such wastes or other matter or derived from the treatment of such wastes or other matter on such vessels or aircraft or offshore installations;*
- (ii) placement of matter for a purpose other than the mere disposal thereof, provided that, if the placement is for a purpose other than that for which the matter was originally designed or constructed, it is in accordance with the relevant provisions of the Convention; and*
- (iii) for the purposes of Annex III, the leaving wholly or partly in place of a disused offshore installation or disused offshore pipeline, provided that any such operation takes place in accordance with any relevant provision of the Convention and with other relevant international law."*

"(o) "Wastes or other matter" does not include:

- (i) human remains;*

- (ii) offshore installations;*

- (iii) offshore pipelines;*

(iv) unprocessed fish and fish offal discarded from fishing vessels."

OSPAR Decision 98/3 on the Disposal of Disused Offshore Installations

Decisions 98/3, OSPAR (1998), amended the Convention in 1998. Under paragraph 2 of the Decisions 98/3, the dumping, and leaving wholly or partly in place, of disused offshore installations is prohibited within the OSPAR maritime area. However, paragraph 3 of the Decision provides a derogation to the paragraph 2 prohibition, providing that following an assessment, the competent authority of the relevant Contracting Party may give permission to leave disused installations or parts of disused installations in place.

The categories where derogations may be considered are outlined in Annex 1 to the Decision, which states the following:

"The following categories of disused offshore installations, excluding their topsides, are identified for the purpose of paragraph 3:

- a) steel installations weighing more than ten thousand tonnes in air [and placed in the maritime area before 9th February 1999];*
- b) gravity based concrete installations;*
- c) floating concrete installations;*
- d) any concrete anchor-base which results, or is likely to result, in interference with other legitimate uses of the sea."*

A disused offshore installation is defined as an offshore installation, which is neither "(a) serving the purpose of offshore activities for which it was originally placed within the maritime area, nor (b) serving another legitimate purpose in the maritime area authorised or regulated by the competent authority of the relevant Contracting Party".

The definition of disused offshore installation does not include "(c) any part of an offshore installation which is located below the surface of the sea-bed, or (d) any concrete anchor-base associated with a floating installation which does not, and is not likely to, result in interference with other legitimate uses of the sea."

OSPAR Decision 98/3 also does not refer to subsea pipelines, umbilicals and their protective materials and therefore are not covered by Decision 98/3.

Decision 98/3 is reviewed every 5 years. The most recent review, in 2013, made no change to the information outlined above.

The Kinsale Area platforms, Alpha and Bravo, each weigh less than 10,000 tonnes. Consequently, the derogation will not be applicable.

International Convention for the Control and Management of Ships' Ballast Water and Sediments

The Ballast Water Management Convention, adopted in 2004 and entered into force in September 2017, aims to prevent the spread of harmful aquatic organisms from one region to another, by establishing standards and procedures for the management and control of ships' ballast water and sediments. Under the Convention, all ships in international traffic are required to manage their ballast water and sediments to a certain standard, according to a ship-specific ballast water management plan. All ships will also have to carry a ballast water record book and an international ballast water management certificate.

A1.3 Relevant European Legislation

Water Framework Directive (2000/60/EC)

The Water Framework Directive, EC (2000), sets the objectives for water protection for the future and applies to inland surface waters, groundwater, transitional waters and coastal waters. Coastal waters are defined in the Directive as *'surface water on the landward side of a line, every point of which is at a distance of one nautical mile on the seaward side from the nearest point of the baseline from which the breadth of territorial waters is measured, extending where appropriate up to the outer limit of transitional waters'*.

The aim of the directive is to prevent and reduce pollution, promote sustainable water use, protect the aquatic environment, improve the status of aquatic ecosystems and mitigate the effects of floods and droughts. The directive addresses the management of water quality and water resources and affects conservation, fisheries, flood defence, development planning and environmental monitoring. It requires Member States to control all impacts, including physical, polluting or otherwise, on our water resource.

The Directive has been transposed in Irish legislation through a number of measures, including the European Communities (Water Policy) Regulations, 2003 (S.I. No. 722 of 2003).

Most of the KADP activities will be located outside 'coastal waters', as defined in the Directive. The Directive requirements will apply only to near shore and onshore decommissioning activities.

Marine Strategy Framework Directive (2008/56/EC)

The 'Marine Strategy Framework Directive' was adopted in 2008, EC (2008a).

The Directive aims to achieve good environmental status for the EU's marine waters by 2020 and to protect the resource base upon which marine-related economic and social activities depend. It is the first EU legislative instrument related to the protection of marine biodiversity, as it contains the explicit regulatory objective that "biodiversity is maintained by 2020", as the cornerstone for achieving good environmental status.

In order to achieve its goal, the Directive establishes European marine regions and sub-regions on the basis of geographical and environmental criteria.

In order to achieve good environmental status by 2020, each Member State is required to develop a strategy for its marine waters, which will be updated every six years.

The Directive applies to water on the seaward side of the baseline to the outmost reach of the area where a Member State has rights, under UNCLOS i.e. 200 nautical miles. The geographical scope of the Marine Spatial Framework Directive overlaps with the Water Framework Directive by one nautical mile.

The Marine Strategy Framework Directive has been transposed into Irish legislation by a number of measures, including the European Communities (Marine Strategy Framework) Regulations (S.I. No. 249 of 2011).

Most of the KADP activities will be located within the marine area, to which the Directive applies. The Directive requirements will apply to KADP activities.

Waste Framework Directive (2008/98/EC)

Directive 2008/98/EC of the European Parliament and of the Council of 19 November 2008 on waste and repealing certain Directives (known as the Waste Framework Directive) has been effective since 12 December 2010, EC (2008b). The new Directive repealed the codified Directive 2006/12/EC on Waste, the Hazardous Waste Directive (91/689/EEC) and the Waste Oils Directive (75/439/EEC).

The Directive seeks to implement the provisions of the Basel Convention, sets the basic concepts and definitions related to waste management and lays down the following waste management principles:

- The "polluter pays principle" which requires costs of waste management to be borne by the original waste producer or by current or previous waste holders; and
- The "waste hierarchy" which is a five-step hierarchy of waste management options which must be applied by Member States when developing their national waste policies, as follows:
 - Waste prevention (preferred option);
 - Re-use;
 - Recycling;
 - Recovery (including energy recovery); and
 - Safe disposal, as a last resort.

The Directive defines 'waste' as *"any substance or object which the holder discards or intends or is required to discard"* (Article 3 (1)).

The Directive also addresses when waste ceases to be waste and becomes a secondary raw material and how to distinguish between waste and 'by-products' and includes recycling and recovery targets.

Article 6 of the Directive provides that certain specified waste can cease to be waste when it has undergone a recovery operation and complies with certain criteria. Regulation No 333/2001 establishes criteria determining when iron, steel and aluminium scrap, including aluminium alloy scrap, ceases to be waste.

Article 13 requires Member States to take the necessary measures to ensure that waste management is carried out without endangering human health, without harming the environment.

Article 23 specifies that Member States shall require any establishment or undertaking intending to carry out waste treatment to obtain a permit from the competent authority. Treatment is defined in Article 3 (14) as *"recovery or disposal operations, including preparation prior to recovery or disposal"*.

The provisions of the Waste Framework Directive have been transposed into Irish Law through the Waste Management Act, 1996 (No. 10 of 1996) as amended and associated regulations.

Waste activities arising from the KADP must comply with the Directive.

Commission Decision 2000/532/EC on the list of wastes, as amended by Commission Decision 2014/955/EU

Commission Decision 2000/532/EC established a list of wastes, in support of the implementation of the Waste Framework Directive. Decision 2000/532/EC has been amended several times. The most recent amendment was by Commission Decision 2014/955/EU, EU (2014b). This Decision establishes the classification system for wastes, including a distinction between hazardous and non-hazardous wastes.

Waste, arising from the KADP, must be classified in accordance with the Decision.

Regulation (EC) No 1013/2006 on Shipments of Waste

Regulation (EC) No 1013/2006 of the European Parliament and of the Council of 14 June 2006 on shipments of waste (as amended) specifies conditions under which waste can be shipped between/through Member States and other countries. Its aim is to strengthen and simplify procedures for controlling waste shipments in order to improve environmental protection and reduce the risk of uncontrolled shipments. The Regulation addresses all types of wastes, with the exception of radioactive waste or waste types subject to separate control regimes. It controls procedures for two classes of waste, as follows:

- The 'Green listed' procedure applies to non-hazardous waste intended for recovery; and
- The 'Amber list' notification procedure applies to shipments of all waste intended for disposal and hazardous waste intended for recovery.

This Regulation is transposed into Irish legislation by the Waste Management (Shipments of Waste) Regulations, 2007 (S.I. No. 419 of 2007).

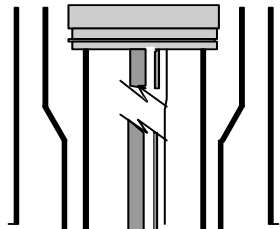
The management of waste, arising from the KADP, must comply with the requirements of the Regulation.

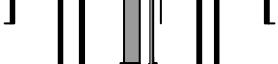
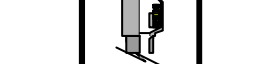
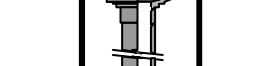
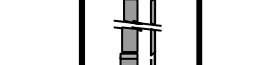
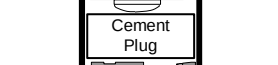
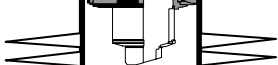
Aarhus Convention (Convention on Access to Information, Public Participation in Decision Making and Access to Justice in Environmental Matters) (1998)

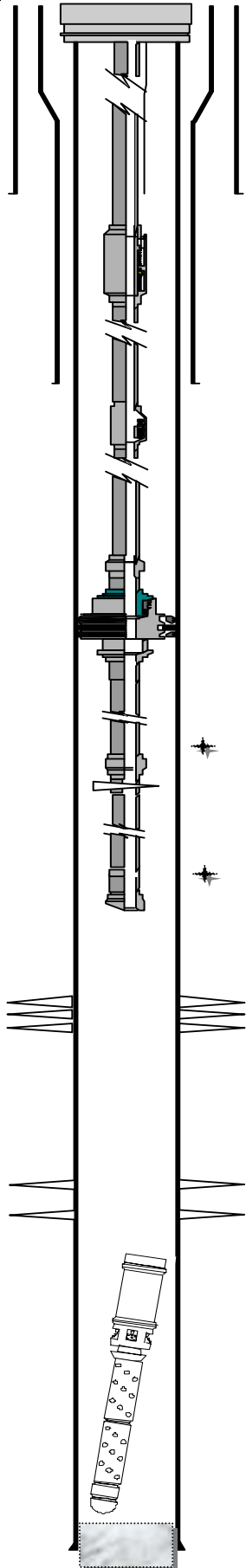
The Public Participation Directive (Directive 2003/35/EC) Directive implements the 1998 Aarhus Convention on Access to Information, Public Participation in Decision Making and Access to Justice in Environmental Matters. The Convention and Directive are intended to improve public access to environmental information and greater participation in the environmental decision-making process. The relevant requirements of the Aarhus Convention, in relation to public participation in decision making on environmental matters, have been incorporated into the EIA Directive 2011/92/EU.

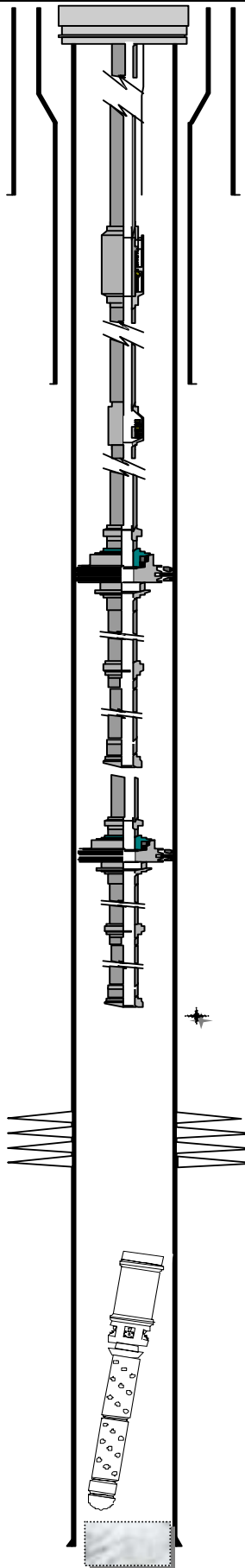
Appendix A2

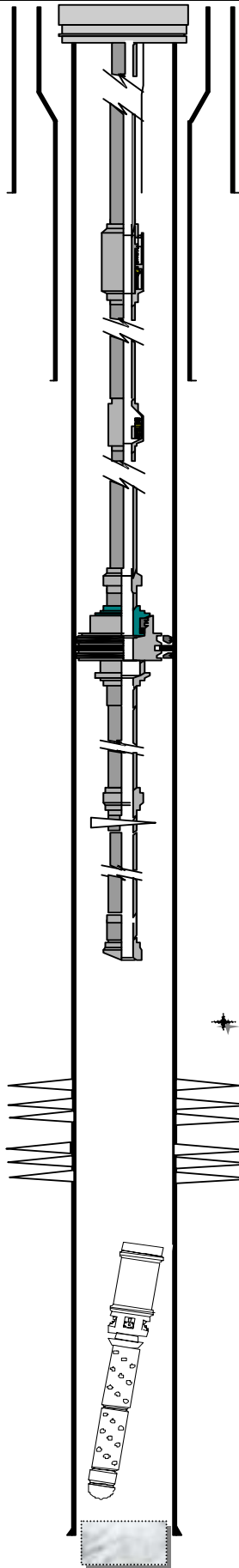
Well Completion Diagrams

Field: Sevenheads			Well 48/24-7A							
Well No. (Block): 48/24-7A			Completion Diagram							
Well type: Development Gas Producer										
Reservoir: Upper Wealden										
Revision History			General Data				Well Data			
Date	Rev	Comment	Rig:	Sedco 704	Date spudded:	16/05/2003	Tubing vol. (bbl) 33			
16/06/2003	0	New Schematic	RKB above LAT:	87 ft	TD date:	27/05/2003	Annular vol. (bbl) 38			
20/06/2003	1	Updated depths	Water depth:	329 ft(LAT)	Completed:	16/06/2003	Ann. Fluid: Inhibited KCl Brine			
		Note* Pip tag, Perfs & 7" Pup joint depths are Loggers depths.	Treehead Datum:	399.21 ft(LAT)	Reservoir Depth :	2,710 ftrkb (Logger)	Ann. Fluid wt (pptf) : 8.6 ppg			
			Location:	Celtic Sea	Reservoir Temp:	78°F	Max. deviation 0 deg			
					Initial Res Pressure:	1,262 Psi	Max. dog leg 0 deg			
MD BRT (ft)	TVD BRT (ft)	Downhole Schematic	Description				Dev Deg	Min ID (ins)	Max OD (ins)	
401	401		Vetco 13 3/8" 10K Tubing Hanger - 5 1/2" New Vam Connection				0	4.882	18.750	
405	405		X-Over Pup 5 ½" 17 lb/ft New Vam x 4 ½" 12.6 lb/ft L80 New Vam				0	3.930	5.520	
			4 ½" 12.6 lb/ft L80 New Vam Tubing				0	3.958	4.5 / 4.892	
572	572		30" Casing Shoe				0	-	-	
1,209	1,209		Camco 4 ½" TRM Safety Valve				0	3.813	5.984	
			7" Liner 23lb/ft down to 1347ft.				0	6.366	7.000	
			7" 29lb/ft down to Shoe				0	6.184	7.000	
			4 ½" 12.6 lb/ft L80 New Vam Tubing				0	3.958	4.5 / 4.892	
2,387	2,387		20" x 9 5/8" Casing Shoe (FIT = 15.85 ppg. EMW)							
2,470	2,470		Camco SPM (Dummy Installed)				0	3.935	5.971	
			4 ½" 12.6 lb/ft L80 New Vam Tubing				0	3.958	4.5 / 4.892	
2,533	2,533		7" Halliburton Hydrostatic Set Retrievable Packer				0	3.878	5.923	
			4 ½" 12.6 lb/ft L80 New Vam Pup Joint				0	3.980	4.5 / 4.892	
2,558	2,558		Camco DB Landing Nipple				0	3.750	5.597	
			4 ½" 12.6 lb/ft L80 New Vam Pup Joint				0	3.940	4.5 / 4.892	
2,580	2,580		Wireline Entry Guide				0	3.861	5.568	
2,645	2,645		7" 29 lb/ft Pup Joint in Liner							
2,646	2,646		Pip Tag in 7" Liner				0	6.184	7.000	
2,709	2,709		A-Sands Top Shot				0	-	-	
2,740	2,740		A-Sands Bottom Shot							
2,749	2,749		7" 29 lb/ft Pup Joint in Liner				0	-	-	
2,771	2,771		Pip Tag in 7" Liner							
2,887	2,887		Upper Wealden Top Shot				0	6.184	7.000	
2,935	2,935		Upper Wealden Bottom Shot							
3,411	3,411		Top of released MAXR				0	N/A	5.750	
			Dropped TCP Gun Assembly (Total Length 85.15 ft)				0	N/A	4.500	
			4 ½" TCP Gun Bull Nose				0	N/A	4.500	
3,496	3,496		PBSD							
3,603	3,603		7" Liner Shoe				0	6.184	7.000	
3,626	3,626		8 ½" Hole TD				0	-	8.500	
Wellhead Data			Casing Data				Shoe Depth		Cement	
Item	Bore	Ser No.	Rating (psi)	Size	Weight	Grade	Couplings	TVDRKB (ft)	TVDSS (LAT) (ft)	TOC RKB (ft)
30" Conductor Housing	27"	M648250-3	10,000	30"	310/457lbs/ft	X-52	ALT-2/ST-2	572	485	Seabed
18 3/4" Wellhead Housing	12.375"	M651680-1	10,000	20" x 9 5/8" X-Over	129.3 lb/ft	X-56	Swift DW2/N Vam	431	344	Seabed
Xmas Tree	4.926"	M400830-1	10,000	9 5/8"	47 lb/ft	L-80	New Vam	2,387	2,300	Seabed
ITC	5.403"	M394960	10,000	7"	23 lb/ft	L-80	New Vam	1,347	1,260	1,638
Guide Base	N/A			7"	29 lb/ft	L-80	New Vam	3,603	3,516	
Rev.1	Prepared by: K Brand			Checked by: K Milne				Date: 20-Jun-03		

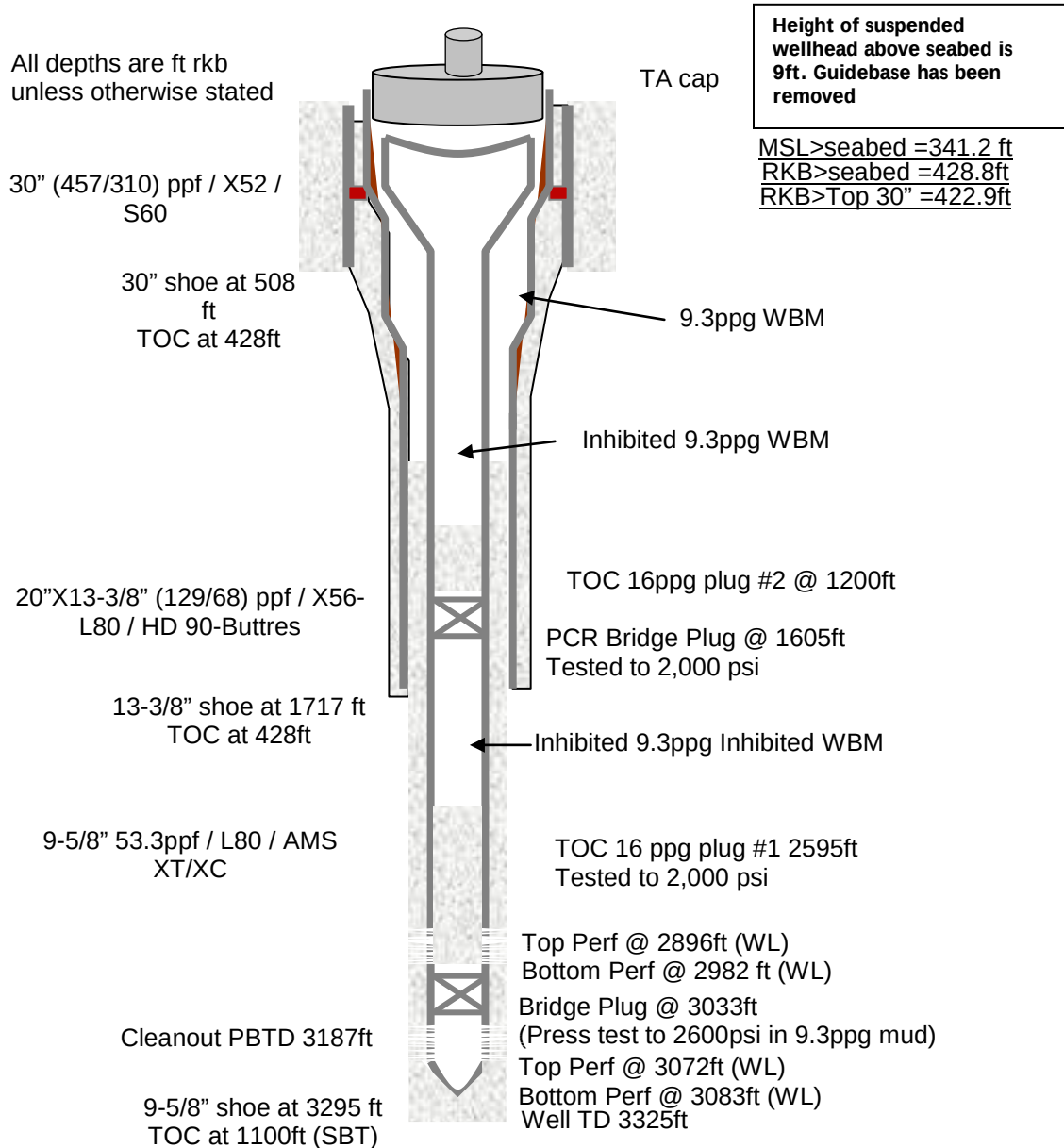
Field: Seven Heads			Ramco							
Well No. (Block): 48/24-5A			Well 48/24-5A							
Well type: Development Gas Producer			Completion Diagram							
Reservoir: Upper Wealden										
Revision History			General Data					Well Data		
Date	Rev	Comment	Rig:	Sedco 704	Date spudded:	12/08/2001	Tubing vol. (bbl)	56 bbl		
02/08/2003	0	New Drawing	RKB above LAT:	87 ft	TD date:	11/09/2001	Annular vol. (bbl)	149 bbls		
05/08/2003	1	Updated to As Built	Water depth:	329 ft(LAT)	Completed:	30/07/2003	Ann. Fluid:	Inhibited KCl Brine		
			Treehead Datum:	402 ft(LAT)	Reservoir Depth:	ftskb (Logger)	Ann. Fluid wt (pptf) :	10.6 ppg		
			Location:	Celtic Sea	Reservoir Temp:	105°F	Max. deviation:	0 deg.		
					Initial Res Pressure:	1,380Psi	Max. dog leg:	0 deg		
MD BRT (ft)	TVD SS (ft)	Downhole Schematic	Description				Dev Deg	Min ID (ins)	Max OD (ins)	
406	319		Vetco 13 3/8" 5K Tubing Hanger - 5 1/2" New Vam Connection				0	4.889	18.750	
			X-Over Pup 5½" 17lb/ft New Vam x 4½" 12.6lb/ft L80 New Vam				0	3.960	5.543	
430	343		20" x 13 3/8" X-Over							
			5 1/2" 17 lb/ft New Vam Tubing				0	4.892	5.500	
538	451		30" Casing Shoe							
			5 1/2" 17 lb/ft New Vam x 5 1/2" 17 lb/ft Vam Top HT Pin X-Over							
1,203	1,116		Camco TRM Safe Valve				0	4.562	7.500	
			5 1/2" 17 lb/ft Vam Top x 4 1/2" 12.6 lb/ft New Vam Pin X-Over							
2,069	1,982		20" x 13 3/8" Casing X-Over							
			4 1/2" 12.6 lb/ft L80 New Vam Tubing				0	3.958	4.5 / 4.892	
2,557	2,470		Camco Gas Lift Mandral Dummy Installed							
			4 1/2" 12.6 lb/ft L80 New Vam Tubing				0	3.958	4.5/4.892	
2,623	2,536		9 5/8" Halliburton Hydraulic Set Retrievable Packer				0	3.933	8.300	
			4 1/2" 12.6 lb/ft L80 New Vam Tubing				0	3.958	4.5 / 4.892	
2,645	2,558		Schlumberger 3.75" DB Nipple				0	3.750	5.593	
			4 1/2" 12.6 lb/ft L80 New Vam Tubing				0	3.958	4.5 / 4.892	
2,665	2,578		Wireline Entry Guide				0	3.861	5.566	
2,776	2,694		Re-perforated upper intervals with 3 3/8"- 6spf Power Jet							
3,025	2,943		Note* All depths from re-perforations down are referenced to Pride of North Sea (RKB above LAT of 82ft).							
3,025	2,943		Original perfs not reperforated							
3,036	2,954									
3,116	3,034		9 5/8" Bridge Plug							
3,123	3,041		9 5/8" Bridge Plug							
3,134-3,145	3,047-3,058		Abandoned Lower Perforations							
3,192-3,205	3,105-3,118									
3,329-3,336	3,242-3,249		Quantum Packer +Tailpipe (49ft) dropped during packer retrieval (below 3,200ft, confirmed by drift run with Drill String)							
3,365	3,278		Released TCP Guns (bottom 44ft of guns miss-fired remain potentially live)							
3,625	3,538		Weatherford 9 5/8" Cement Retainer							
3,647	3,560		9 5/8" Schlumberger Quantum Packer							
3,824-3,835	3,737-3,748		DST Perforations							
3,894	3,812		Released TCP Guns							
4,000-4,015	3,913-3,928		DST Perforations							
4,121	4,039		9 5/8" Float Collar							
4,254	4,167		9 5/8" Casing Shoe							
4,280	4,198		12 1/4" TD							
Wellhead Data			Casing Data: (Note* All depths referenced Pride North Sea)				Shoe Depth		Cement	
Item	Bore	Ser No.	Rating (psi)	Size	Weight	Grade	Couplings	TVDRKB (ft)	TVDSS (LAT) (ft)	TOC RKB (ft)
30" Conductor Housing	27"			30"	1" Wall	X-52	ALT-2/ST-2	538	456	Seabed
18 3/4" Wellhead Housing	12.375"		5,000	20" x 13 3/8" X-Over	129.3 lb/ft	X-56	Swift DW2/N Vam	430	343	Seabed
Xmas Tree	4.892"	M400810-1	5,000	13 3/8"	72 lb/ft	L-80	New Vam	2,069	1,987	Seabed
ITC	5.403"	M432110-1	5,000	9 5/8"	47 lb/ft	L-80	New Vam	4,259	4,177	-
Guide Base	n/a									
Rev. 1	Prepared by: K Milne			Checked by: D Lawson			Date:			
	Signed: K Milne			Signed: D Lawson			5-Aug-03			

Field: Sevenheads			Ramco Well 48/24-6 Completion Diagram							
Well No. (Block): 48/24-6										
Well type: Development Gas Producer										
Reservoir: Upper Wealden										
Revision History			General Data				Well Data			
Date	Rev	Comment	Rig:	Sedco 711	Date spudded:	15/03/2003	Tubing vol. (bbl)	36		
17/03/2003	0	New Schematic	RKB above LAT:	87 ft	TD date:	29/03/2003	Annular vol. (bbl)	43		
10/04/2003	1	Updated after completion ran.	Water depth:	331 ft(LAT)	Completed:	14/04/2003	Ann. Fluid:	Inhibited KCl Brine		
		Note* Pip tag, Perfs & 7" Pup joint depths are Loggers depths.	Datum (RT):	400.60 ft	Reservoir Depth :	2856 ft tvdss	Ann. Fluid wt (pptf) :	8.6 ppg		
			Location:	Celtic Sea	Reservoir Temp:	90°F	Max. deviation	0		
					Initial Res Pressure:	1,380 psi	Max. dog leg	0		
MD BRT (ft)	TVD BRT (ft)	Downhole Schematic	Description				Dev Deg	Min ID (ins)	Max OD (ins)	
406	406		Vetco 13 3/8" 10K Tubing Hanger - 5 1/2" New Vam Connection				0	4.926	18.810	
			X-Over Pup 5 ½" 17 lb/ft New Vam X 4 ½" 12.6 lb/ft L80 New Vam				0	3.930	5.520	
			4 ½" 12.6 lb/ft L80 New Vam Tubing				0	3.958	4.5 / 4.892	
576	576		30" Casing Shoe				0	-	-	
1,229	1,229		Camco 4 ½" TRM Safety Valve				0	3.812	5.998	
			7" Liner 23lb/ft down to 1352ft.				0	6.366	7.000	
			7" 29lb/ft down to Shoe				0	6.184	7.000	
			4 ½" 12.6 lb/ft L80 New Vam Tubing				0	3.958	4.5 / 4.892	
2,378	2,378		20" x 9 5/8" Casing Shoe							
2,636	2,636		Camco SPM (Dummy Installed)				0	3.940	5.978	
			4 ½" 12.6 lb/ft L80 New Vam Tubing				0	3.958	4.5 / 4.892	
2,697	2,697		7" Halliburton Hydrostatic Set Retrievable Packer				0	3.948	5.926	
			4 ½" 12.6 lb/ft L80 New Vam Pup Joint				0	3.958	4.5 / 4.892	
2,695	2,695		Pip Tag in 7" Liner							
2,763	2,763		Camco DB Landing Nipple				0	3.760	5.596	
			4 ½" 12.6 lb/ft L80 New Vam Pup Joint				0	3.958	4.5 / 4.892	
2,781	2,781		Pip Tag in 7" Liner							
2,785	2,785		Wireline Entry Guide				0	3.860	5.567	
2,825	2,825		7" 29 lb/ft Pup Joint in Liner				0	6.184	7.000	
2,856	2,856		Top Shot				0	-	-	
3,045	3,045		Bottom Shot				0	-	-	
3,676	3,676		7" 29 lb/ft Pup Joint in Liner				0	6.184	7.000	
3,725	3,725		FIT 5 Top Shot				0	-	-	
3,740	3,740		FIT 5 Bottom Shot				0	-	-	
3,843	3,843		Top of released MAXR				0	N/A	5.750	
			Dropped TCP Gun Assembly (Total Length 227.64 ft)				0	N/A	4.500	
			4 ½" TCP Gun Bull Nose				0	N/A	4.500	
4,071			PBTD							
4,243			7" Liner Shoe				0	6.184	7.000	
4,260			8 ½" Hole TD				0	N/A	8.500	
Wellhead Data			Casing Data				Shoe Depth		Cement	
Item	Bore	Ser No.	Rating (psi)	Size	Weight	Grade	Couplings	TVDRKB (ft)	TVDSS (ft)	TOCRKB (ft)
30" Conductor Housing	27"	M648250-1	10,000	30"	310 / 457 lbs/ft	X-52	ALT-2/ST2	576	158	Surface
18 3/4" Wellhead Housing	12.375"	M651690-1	10,000	20" x 9 5/8" X-Over	129.3 lb/ft	X-56	Swift DW2/N Vam	520	102	Surface
Xmas Tree	4.926"	M400820	10,000	9 5/8"	47 lb/ft	L-80	New Vam	2,378	1,960	Surface
ITC	5.403"	M364170-1	10,000	7"	23 lb/ft	L-80	New Vam	1,352	934	N/A
Guide Base	n/a			7"	29 lb/ft	L-80	New Vam	4,245	3,827	2,160
Rev.1	Prepared by: K. Milne			Checked by: N.Coxon				Date: 14th April 03		
	Signed:			Signed:						

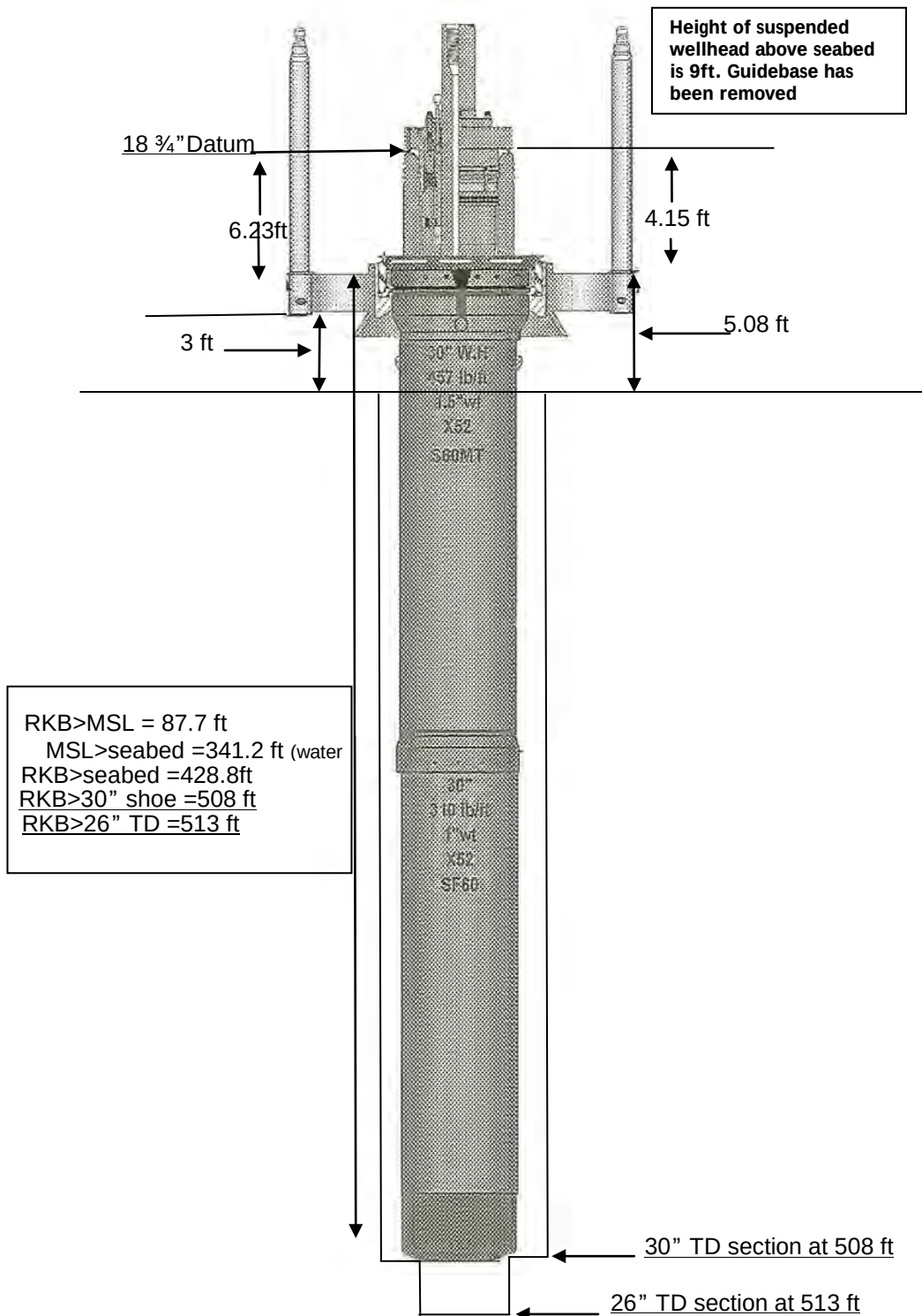
Field: Sevenheads				Ramco							
Well No. (Block): 48/24-8				Well 48/24-8							
Well type: Development Gas Producer				Completion Diagram							
Reservoir: Upper Wealden											
Revision History				General Data				Well Data			
Date	Rev	Comment		Rig:	Sedco 711	Date spudded:	12/06/2003	Tubing vol. (bbl)	26 bbl		
08/07/2003	0	New Schematic		RKB above LAT:	87 ft	TD date:	02/07/2003	Annular vol. (bbl)	31 bbls		
13/07/2003	1	Re run completion		Water depth:	320 ft(LAT)	Completed:	15/07/2003	Ann. Fluid:	Inhibited KCl Brine		
		Note* Pip tag, Perfs & 7" Pup joint depths are Loggers depths.		Treehead Datum:	388.05 ft(LAT)	Reservoir Depth :	2,290 ftrkb (Logger)	Ann. Fluid wt (pptf) :	8.6 ppg		
				Location:	Celtic Sea	Reservoir Temp -	78 °F	Max. deviation	6.17 deg		
						Initial Res Pressure -	1,126 Psi	Max. dog leg	1.84 deg		
MD BRT (ft)	TVD BRT (ft)	Downhole Schematic		Description				Dev Deg	Min ID (ins)	Max OD (ins)	
390	390			Vetco 13 3/8" 10K Tubing Hanger - 5 1/2" New Vam Connection				0	4.906	18.750	
394	394			X-Over Pup 5 ½" 17 lb/ft New Vam X 4 ½" 12.6 lb/ft L80 New Vam				0	3.960	5.543	
				4 ½" 12.6 lb/ft L80 New Vam Tubing				0	3.958	4.5 / 4.892	
545	545			30" Casing Shoe				0	-	-	
1,180	1,180			Camco 4 ½" TRM Safety Valve				0	3.813	5.992	
				7" Liner 23lb/ft down to 1345ft.				0	6.366	7.000	
				7" 29lb/ft down to Shoe.				0	6.184	7.000	
				4 ½" 12.6 lb/ft L80 New Vam Tubing				0	3.958	4.5 / 4.892	
1,782	1,782			20" X 9 5/8" Casing Shoe (FIT = 15.85 ppg. EMW)							
2,009	2,009			Camco SPM (Dummy Installed)				0	3.936	5.997	
				4 ½" 12.6 lb/ft L80 New Vam Tubing				0	3.958	4.5 / 4.892	
2,077	2,077			7" Halliburton (HHT) Hydrostatic Set Retrievable Packer				0	3.865	5.897	
				4 ½" 12.6 lb/ft L80 New Vam Pup Joint				0	3.958	4.5 / 4.892	
2,101	2,101			Camco 3.750" DB Landing Nipple				0	3.770	5.597	
				4 ½" 12.6 lb/ft L80 New Vam Pup Joint				0	3.958	4.5 / 4.892	
2,123	2,123			Wireline Entry Guide				0	3.861	5.560	
								0	3.750	5.597	
2,130	2,130			4 ½" 12.6 lb/ft L80 New Vam Cut tubing joints.				0	3.958	4.5 / 4.892	
2,165	2,165			7" Halliburton (HHC) Hydrostatic Set Retrievable Packer				0	3.879	5.927	
				4 ½" 12.6 lb/ft L80 New Vam Pup Joint				0	3.958	4.5 / 4.892	
2,190	2,190			Camco 3.750" DB Landing Nipple				0	3.750	5.597	
				4 ½" 12.6 lb/ft L80 New Vam Pup Joint					3.958	4.5 / 4.892	
2,211	2,211			Wireline Entry Guide				0	3.861	5.560	
2,187	2,187			Pip Tag in 7" Liner							
2,270	2,270			7" 29 lb/ft Pup Joint in Liner				0	6.184	7.000	
2,300	2,300			Top Shot				0	-	-	
2,537	2,537			Blank							
2,651	2,651			Section							
2,730	2,730			Bottom Shot							
3,585	3,585			Top of released MAXR				0	N/A	5.750	
				Dropped TCP Gun Assembly (Total Length 467.48 ft)				0	N/A	4.500	
				4 ½" TCP Gun Bull Nose				0	N/A	4.500	
4,052	4,052			PBSD							
4,141	4,141			7" Liner Shoe				0	6.184	7.000	
4,150	4,148			8 ½" Hole TD				0	-	8.500	
Wellhead Data				Casing Data				Shoe Depth		Cement	
Item		Bore	Ser No.	Rating (psi)	Size	Weight	Grade	Couplings	TVDRKB (ft)	TVDSS (LAT) (ft)	TOC RKB (ft)
30" Conductor Housing		27"	M653310-2	10,000	30"	310/457lbs/ft	X-52	ALT-2/ST-2	545	458	Seabed
18 3/4" Wellhead Housing		12.375"	M651670-2	10,000	20" x 9 5/8" X-Over	129.3 lb/ft	X-56	Swift DW2/N Vam	389	302	Seabed
Xmas Tree		4.926"	M426290	10,000	9 5/8"	47 lb/ft	L-80	New Vam	1,782	1,695	Seabed
ITC		5.403"	M427860	10,000	7"	23 lb/ft	L-80	New Vam	1,345	1,258	N/A
Guide Base		N/A			7"	29 lb/ft	L-80	New Vam	4,141	4,054	2,178
Rev.1	Prepared by: K Milne			Checked by: D. Lawson				Date:			
	Signed: K Milne			Signed: D. Lawson				5-Aug-03			

Field: Sevenheads			Well 48/24-9							
Well No. (Block): 48/24-9			Completion Diagram							
Well type: Development Gas Producer										
Reservoir: Upper Wealden										
Revision History			General Data					Well Data		
Date	Rev	Comment	Rig: Sedco 704	Date spudded	24-Jun-03	Tubing vol. (bbl)	35.5bbl			
03/07/2003	0	New Schematic	RKB above Sea Level: 87 ft	TD date	04-Jul-03	Annular vol. (bbl)	42.5bbl			
13/07/2003	1	Updated As Run	Water depth: 325 ft (LAT)	Completed	16-Jul-03	Ann. Fluid:	Inhibited KCl Brine			
		Note* Pip tag, Perfs & 7" Pup joint depths are Loggers depths.	Treehead Datum: 400.53 ft(LAT)	Reservoir Depth	2,850 ftrkb (Logger)	Ann. Fluid wt (pptf) :	8.6 ppg			
			Location: Celtic Sea	Reservoir Temp	77 deg F	Max. deviation	3.30 deg.			
			Initial Res Pressure	1,181 Psi	Max. dog leg	0.63 deg				
MD BRT (ft)	TVD BRT (ft)	Downhole Schematic	Description			Dev Deg	Min ID (ins)	Max OD (ins)		
400	400		Vetco 13 3/8" 10K Tubing Hanger - 5 1/2" New Vam Connection			0	4.889	18.750		
404	404		X-Over Pup 5 ½" 17 lb/ft New Vam X 4 ½" 12.6 lb/ft L80 New Vam			0	3.930	5.520		
			4 ½" 12.6 lb/ft L80 New Vam Tubing			0	3.958	4.5 / 4.892		
570	570		30" Casing Shoe			0	-	-		
1,206	1,206		Camco 4 ½" TRM Safety Valve			0	3.813	5.984		
1,515	1,515		7" Liner 23 lb/ft down to 1,535ft.			0	6.366	7.000		
1,515	1,515		7" 29 lb/ft down to Shoe			0	6.184	7.000		
2,438	2,438		4 ½" 12.6 lb/ft L80 New Vam Tubing			0	3.958	4.5 / 4.892		
			9 5/8" Casing Shoe							
2,619	2,619		Camco SPM (Dummy Installed)			0	3.935	5.971		
			4 ½" 12.6 lb/ft L80 New Vam Tubing			0	3.958	4.5 / 4.892		
2,685	2,685		7" Halliburton Hydrostatic Set Retrievable Packer			0	3.878	5.923		
			4 ½" 12.6 lb/ft L80 New Vam Pup Joint			0	3.980	4.5 / 4.892		
2,710	2,710		Camco DB Landing Nipple			0	3.750	5.597		
			4 ½" 12.6 lb/ft L80 New Vam Pup Joint			0	3.958	4.5 / 4.892		
2,732	2,732		Wireline Entry Guide			0	3.861	5.568		
2,746	2,746		Pip Tag in 7" Liner			0	6.184	7.000		
2,789	2,789		7" 29 lb/ft Pup Joint in Casing			0	6.184	7.000		
2,850	2,850		Upper Wealden Top Shot							
2,912	2,912		Upper Wealden Bottom Shot							
2,952	2,952		Upper Wealden Top Shot							
3,025	3,025		Upper Wealden Bottom Shot							
3,296	3,296		Top of released MAXR			0	N/A	5.750		
			Dropped TCP Gun Assembly (Total Length 213 ft)			0	N/A	4.500		
			4 ½" TCP Gun Bull Nose			0	N/A	4.500		
3,520	3,520		PBSD							
3,642	3,642		7" Liner Shoe			0	6.184	7.000		
3,655	3,655		8 ½" Hole TD			0	-	8.500		
Wellhead Data			Casing Data				Shoe Depth		Cement	
Item	Bore	Ser No.	Rating (psi)	Size	Weight	Grade	Couplings	TVDRKB (ft)	TVDSS (LAT) (ft)	TOC RKB (ft)
30" Conductor Housing	27"	M180740-M1	10,000	30"	310/457lbs/ft	X-52	ALT-2/ST-2	570	483	Seabed
18 3/4" Wellhead Housing	12.375"	M651690-1	10,000	20" x 9 5/8" X-Over	129.3 lb/ft	X-56	Swift DW2/N Vam	430	343	Seabed
Xmas Tree	4.926"	M426280-1	10,000	9 5/8"	47 lb/ft	L-80	New Vam	2,438	2,351	Seabed
Tubing Hanger	4.926"	M427850	10,000	7"	23 lb/ft	L-80	New Vam	1,535	1,448	N/A
ITC	5.403"	M394970	10,000	7"	29 lb/ft	L-80	New Vam	3,642	3,555	1,575
Rev.1	Prepared by: D Lawson			Checked by: N Coxon				Date: 16-Jul-03		
	Signed:			Signed:						

Suspension Diagram



Casing Reports

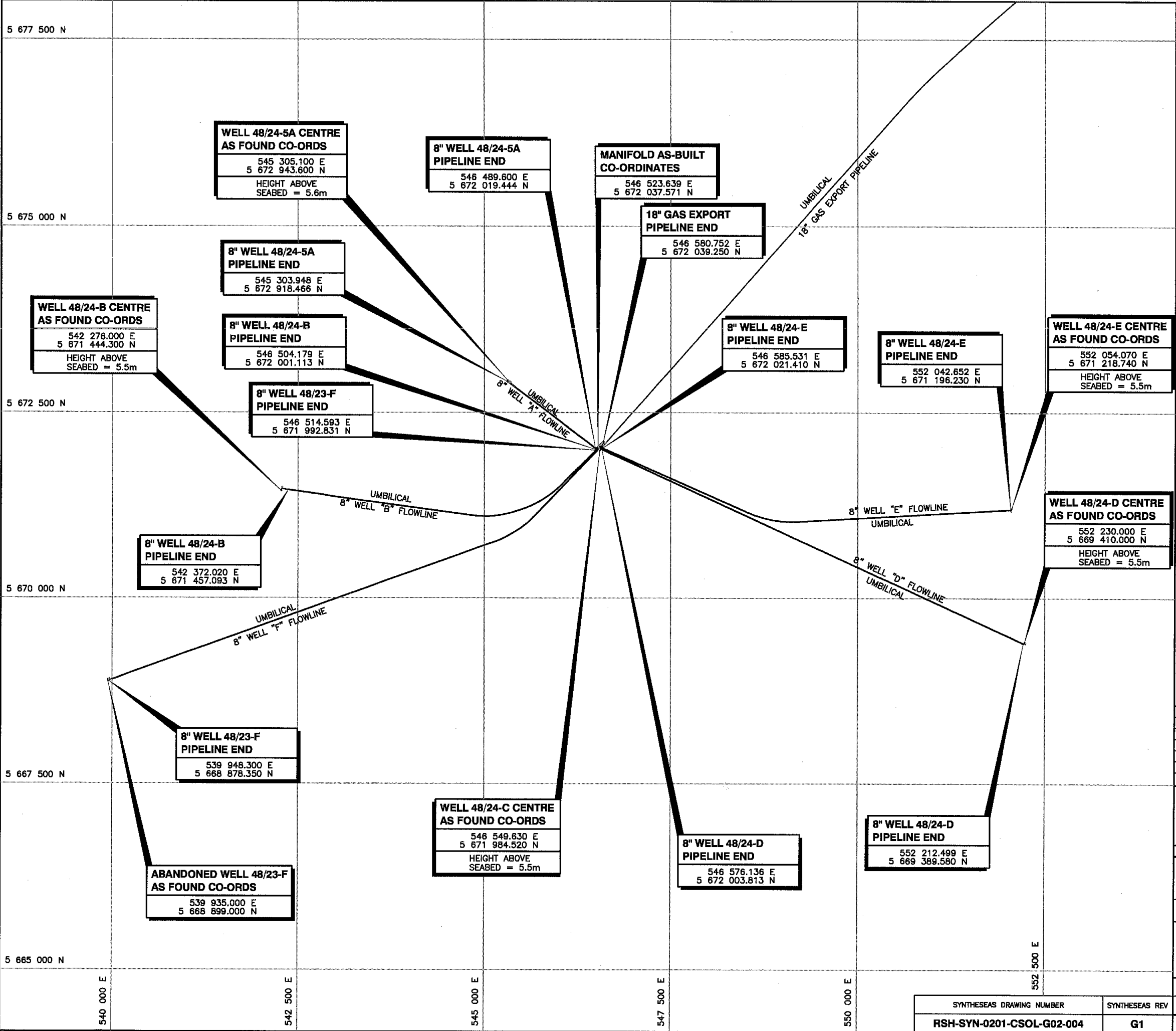


Appendix A3

Layout Drawings

A3 Layout Drawings

Drawing No.	Drawing Name	Revision
WK-UK002666-0023	As-build infield layout	4
WK-UK002666-0024	As-build field layout at the manifold	8
WK-UK002666-0025	As-build field layout at well "A"	5
WK-UK002666-0026	As-build field layout at well "B"	5
WK-UK002666-0027	As-build field layout at well "D"	4
WK-UK002666-0028	As-build field layout at well "E"	5
WK-UK002666-0029	As-build field layout at well "F"	4
WK-UK002666-0031	As-built field layout at Kinsale "A"	4
WK-UK002666-0033	As-built overall field layout	3



NOTES
1. ALL CO-ORDINATES ARE GIVEN IN METRES AND ARE BASED ON U.T.M. ZONE 29 INTERNATIONAL SPHEROID ED50. CENTRAL MERIDIAN 9° WEST

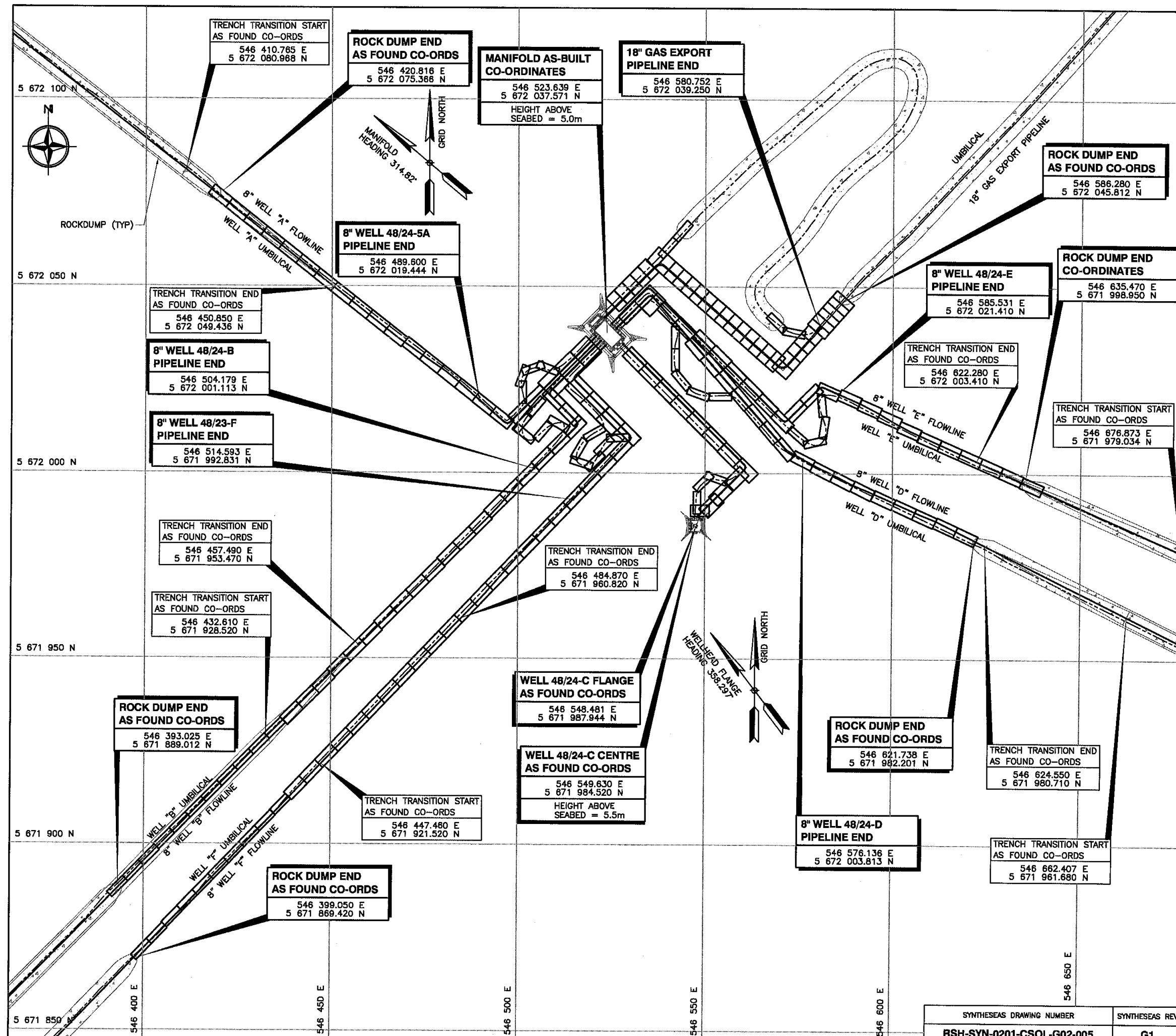
ORIGINAL

4	24.11.03	WELL CO-ORDS UPDATED	R.E.				
3	23.10.03	AS BUILT INFO ADDED	R.E.	B.W.	J.C.	J.C.	
2	10.7.03	MANIFOLD AS-BUILT POSTN ADDED	R.E.	A.S.	J.C.	J.C.	
1	4.4.03	AS-BUILT	R.E.	R.E.	B.W.	J.C.	B.B.
REV	DATE	REVISION	ORIG.	BY	D.O.	ENG.	APP.

TECHNIP-COFLEXIP
OFFSHORE BRANCH
TECHNIP OFFSHORE UK LIMITED
THIS DRAWING IS TECHNIP OFFSHORE UK LIMITED PROPERTY AND WILL NOT BE DISCLOSED WITHOUT THEIR AUTHORIZATION
CLIENT:
RAMCO OIL & GAS LTD.
PROJECT:
SEVEN HEADS GAS FIELD DEVELOPMENT
TITLE:
AS-BUILD INFELD LAYOUT

REFERENCE No.	DRAWING NUMBER	REV.
	WK-UK002666-0023	4
ORIG. SIZE: A1	SCALE: 1:25000	

SYNTHESAS DRAWING NUMBER	SYNTHESAS REV
RSH-SYN-0201-CSOL-G02-004	G1



NOTES

1. ALL CO-ORDINATES ARE GIVEN IN METRES AND ARE BASED ON U.T.M. ZONE 29 INTERNATIONAL SPHEROID ED50. CENTRAL MERIDIAN 9° WEST

LOCATION	MATTRESS QUANTITIES		
	6x3x0.15	6x2x0.15	5x3x0.15
MANIFOLD SPOOLPIECE AND UMB TO KINSALE PIPELINE	—	10	25
MANIFOLD SPOOLPIECE AND UMB TO WELL 48-24/5A PIPELINE	22	4	—
MANIFOLD SPOOLPIECE AND UMB TO WELL 48/24-B PIPELINE	24	16	—
MANIFOLD SPOOLPIECE AND UMB TO WELL 48/24-C	12	3	—
MANIFOLD SPOOLPIECE AND UMB TO WELL 48/24-D PIPELINE	16	5	—
MANIFOLD SPOOLPIECE AND UMB TO WELL 48/24-E PIPELINE	24	4	—
MANIFOLD SPOOLPIECE AND UMB TO WELL 48/23-F PIPELINE	26	19	—
TOTALS	124	61	25

ORIGINAL

REV	DATE	REVISION	ORIG.	BY	D.O.	ENG.	APP.
8	24.11.03	WELL CO-ORDS UPDATED	R.E.				
7	27.10.03	CLIENT DRG No ADDED	R.E.	B.W.	J.C.	J.C.	
6	22.10.03	AS BUILT INFO ADDED	R.E.	B.W.	J.C.	J.C.	
5	9.7.03	MANIFOLD AS-BUILT POSTN ADDED	R.E.	A.S.	J.C.	J.C.	
4	3.7.03	POSITION OF WELL 48/24-C ADDED	R.E.	A.S.	J.C.	J.C.	
3	2.7.03	MAIN UMBILICAL ADDED	R.E.	A.S.	J.C.	J.C.	
2	21.6.03	UMBILICALS "A" AND "F" ADDED	R.E.	G.M.	J.C.	J.C.	
1	20.6.03	AS-BUILT	R.E.	R.E.	B.W.	J.C.	J.C.

TECHNIP-COFLEXIP

OFFSHORE BRANCH
TECHNIP OFFSHORE UK LIMITED

THIS DRAWING IS TECHNIP OFFSHORE UK LIMITED PROPERTY AND WILL NOT BE DISCLOSED WITHOUT THEIR AUTHORISATION

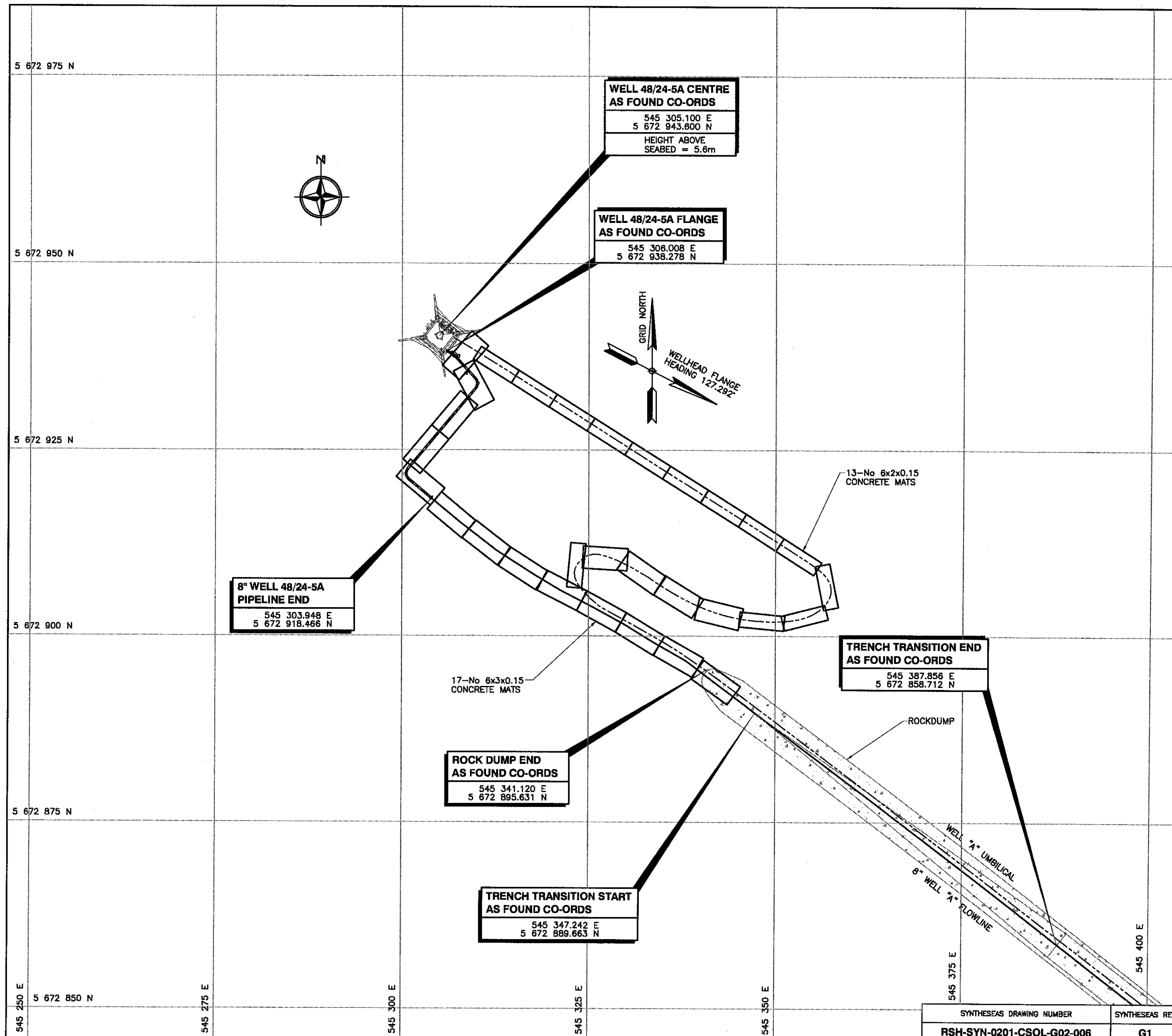
CLIENT: **RAMCO OIL & GAS LTD.**

PROJECT: **SEVEN HEADS GAS FIELD DEVELOPMENT**

TITLE: **AS-BUILD FIELD LAYOUT AT THE MANIFOLD**

REFERENCE No.	DRAWING NUMBER	REV.
	WK-UK002666-0024	8

SYNTHESSEAS DRAWING NUMBER	SYNTHESSEAS REV	ORIG. SIZE	SCALE
RSH-SYN-0201-CSOL-G02-005	G1	A1	1:500



NOTES

1. ALL CO-ORDINATES ARE GIVEN IN METRES AND ARE BASED ON U.T.M. ZONE 29 INTERNATIONAL SPHEROID ED50, CENTRAL MERIDIAN 9° WEST

ORIGINAL

REV	DATE	REVISION	ORIG.	BY	D.O.	ENG.	APP.
5	24.11.23	WELL CO-ORDS UPDATED	R.E.				
4	27.10.03	CLIENT DRG No ADDED	R.E.	B.W.	J.C.	J.C.	
3	22.10.03	AS BUILT INFO ADDED	R.E.	B.W.	J.C.	J.C.	
2	4.7.03	WELL 48/24-5A ADDED	R.E.	A.S.	D.L.		
1	30.6.03	AS-BUILT	R.E.	R.E.	A.S.	J.C.	J.C.

TECHNIP-COFLEXIP

OFFSHORE BRANCH
 TECHNIP OFFSHORE UK LIMITED

THIS DRAWING IS TECHNIP OFFSHORE UK LIMITED PROPERTY AND WILL NOT BE DISCLOSED WITHOUT THEIR AUTHORISATION

CLIENT: **RAMCO OIL & GAS LTD.**

PROJECT: **SEVEN HEADS GAS FIELD DEVELOPMENT**

TITLE: **AS-BUILT FIELD LAYOUT AT WELL "A"**

REFERENCE No.	DRAWING NUMBER	REV.
	WK-UK002686-0025	5

SYNTHESSEAS DRAWING NUMBER	SYNTHESSEAS REV	ORIG. SIZE	SCALE
RSH-SYN-0201-CSOL-G02-006	G1	A1	1:250

NOTES

- ALL CO-ORDINATES ARE GIVEN IN METRES AND ARE BASED ON U.T.M. ZONE 29 INTERNATIONAL SPHEROID ED50. CENTRAL MERIDIAN 9° WEST



13-No 6x2x0.15
CONCRETE MATS

**TRENCH TRANSITION START
AS FOUND CO-ORDS**

542 421.087 E
5 671 450.435 N

**TRENCH TRANSITION END
AS FOUND CO-ORDS**

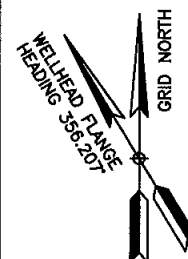
542 471.560 E
5 671 443.587 N

27-No 6x3x0.15
CONCRETE MATS

WELL "B" UMBILICAL

8" WELL "B" FLOWLINE

ROCKDUMP



**8" WELL 48/24-B
PIPELINE END**

542 372.020 E
5 671 457.093 N

**ROCK DUMP END
AS FOUND CO-ORDS**

542 413.211 E
5 671 451.504 N

**WELL 48/24-B FLANGE
AS FOUND CO-ORDS**

542 275.289 E
5 671 446.013 N

**WELL 48/24-B CENTRE
AS FOUND CO-ORDS**

542 276.000 E
5 671 444.300 N

HEIGHT ABOVE
SEABED = 5.5m

ORIGINAL

REV	DATE	REVISION	ORIG.	BY	D.O.	ENG.	APP.
5	26.11.03	WELL CO-ORDS UPDATED	R.E.				
4	27.10.03	CLIENT DRG No ADDED	R.E.	B.W.	J.C.	J.C.	
3	22.10.03	AS BUILT INFO ADDED	R.E.	B.W.	J.C.	J.C.	
2	4.7.03	WELL 48/24-B ADDED	R.E.	A.S.	D.L.		
1	30.6.03	AS-BUILT	R.E.	R.E.	A.S.	J.C.	J.C.

TECHNIP-COFLEXIP

OFFSHORE BRANCH
TECHNIP OFFSHORE UK LIMITED

THIS DRAWING IS TECHNIP OFFSHORE UK LIMITED PROPERTY AND WILL NOT BE DISCLOSED WITHOUT THEIR AUTHORISATION

CLIENT:

RAMCO OIL & GAS LTD.



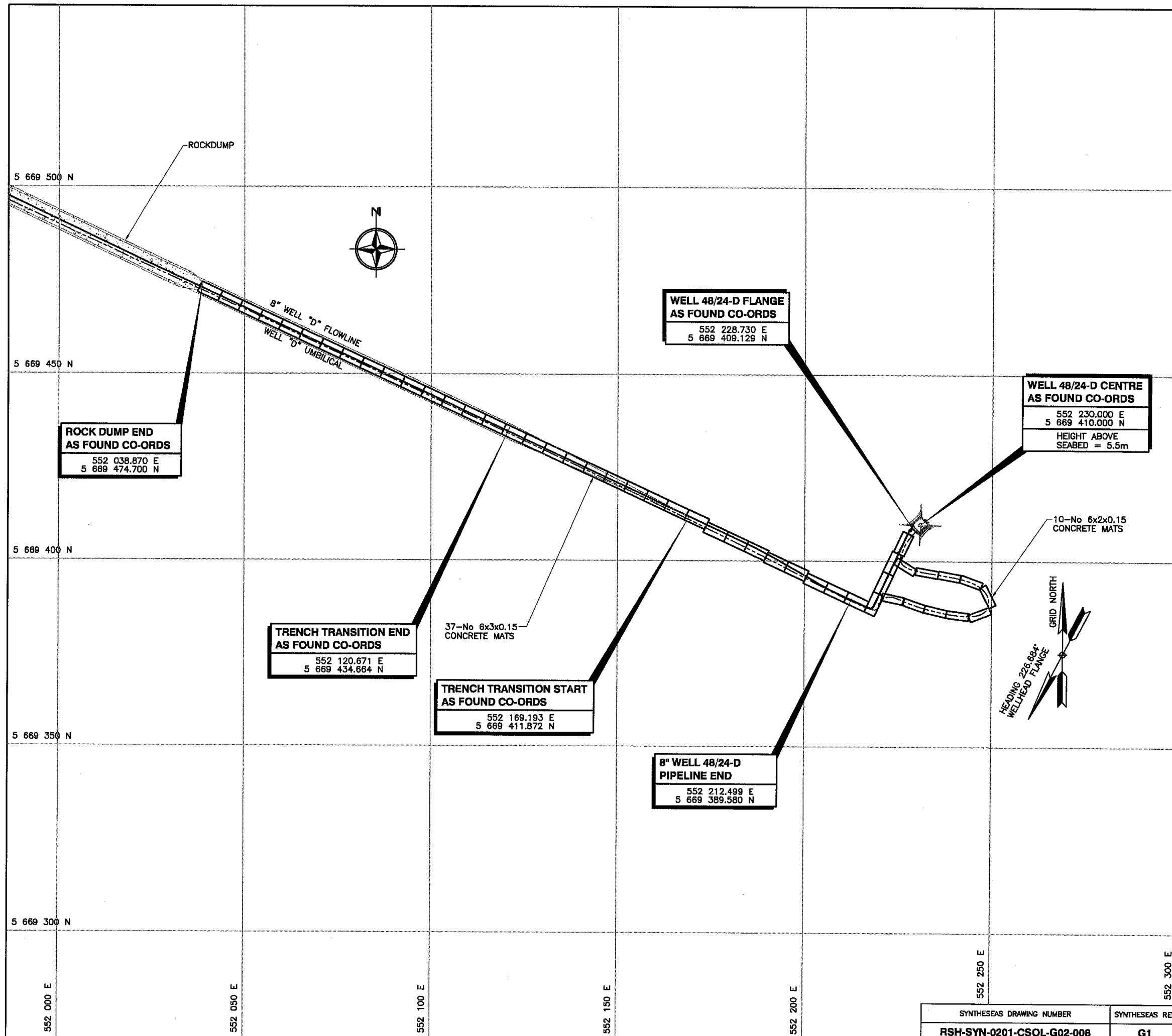
Synthesas

PROJECT: **SEVEN HEADS GAS FIELD DEVELOPMENT**

TITLE: **AS-BUILT FIELD LAYOUT
AT WELL "B"**

REFERENCE No.	DRAWING NUMBER	REV.
	WK-UK002666-0026	5

SYNTHESAS DRAWING NUMBER	SYNTHESAS REV	ORIG. SIZE	SCALE
RSH-SYN-0201-CSOL-G02-007	G1	A1	1:300



NOTES

- ALL CO-ORDINATES ARE GIVEN IN METRES AND ARE BASED ON U.T.M. ZONE 29 INTERNATIONAL SPHEROID ED50. CENTRAL MERIDIAN 9° WEST

ORIGINAL

REV	DATE	REVISION	ORIG.	BY	D.O.	ENG.	APP.
4	24.11.03	WELL CO-ORDS UPDATED	R.E.				
3	27.10.03	CLIENT DRG No ADDED	R.E.	B.W.	J.C.	J.C.	
2	22.10.03	AS-BUILT INFO ADDED	R.E.	B.W.	J.C.	J.C.	
1	30.6.03	AS-BUILT	R.E.	R.E.	A.S.	J.C.	J.C.

TECHNIP-COFLEXIP

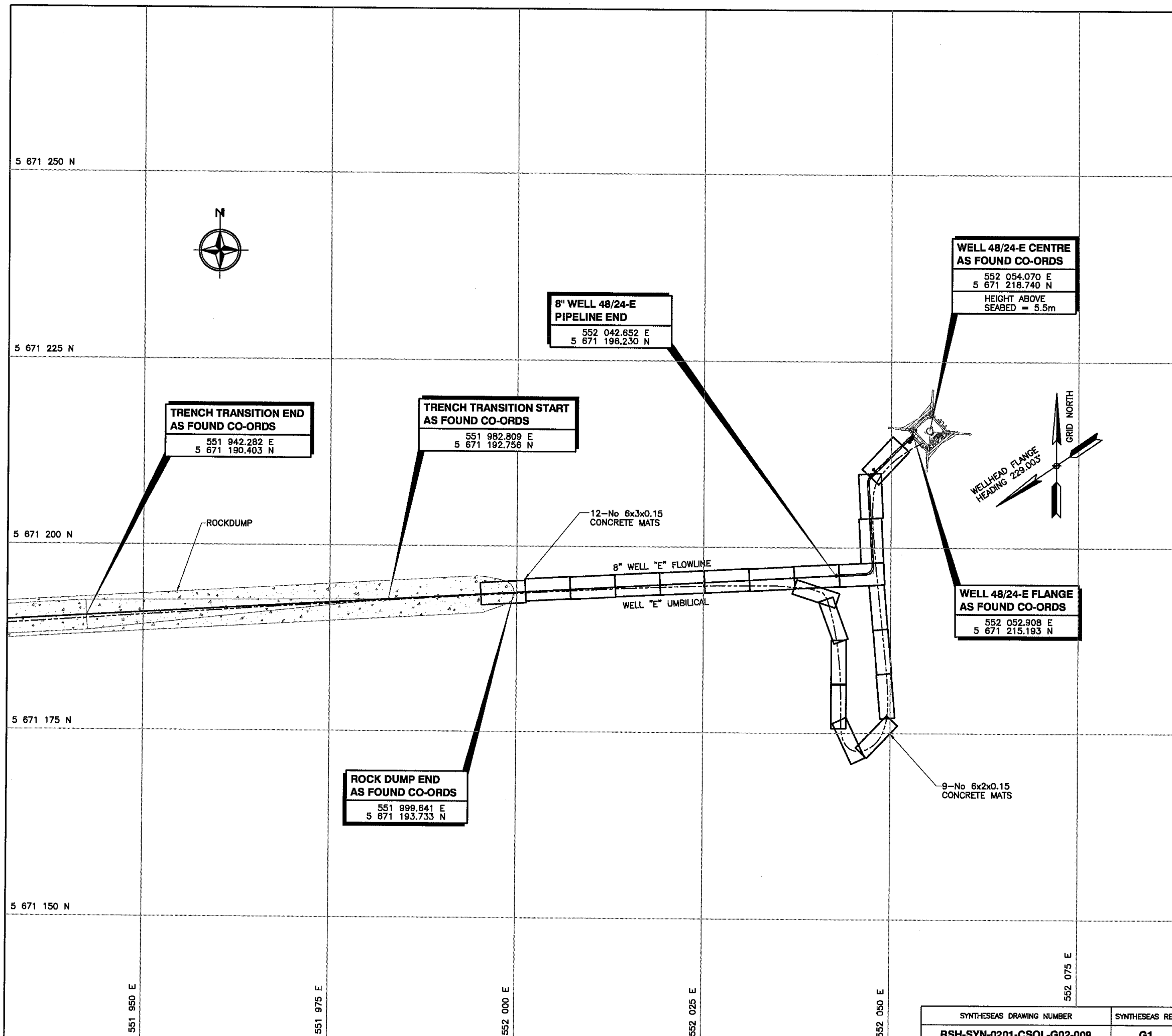
OFFSHORE BRANCH
TECHNIP OFFSHORE UK LIMITED

THIS DRAWING IS TECHNIP OFFSHORE UK LIMITED PROPERTY AND WILL NOT BE DISCLOSED WITHOUT THEIR AUTHORISATION

CLIENT:	RAMCO OIL & GAS LTD.	Syntheseas
PROJECT:	SEVEN HEADS GAS FIELD DEVELOPMENT	
TITLE:	AS-BUILD FIELD LAYOUT AT WELL "D"	

REFERENCE No.	DRAWING NUMBER	REV.
	WK-UK002666-0027	4
ORIG. SIZE: A1	SCALE: 1:500	

SYNTHESEAS DRAWING NUMBER	SYNTHESEAS REV
RSH-SYN-0201-CSOL-G02-008	G1



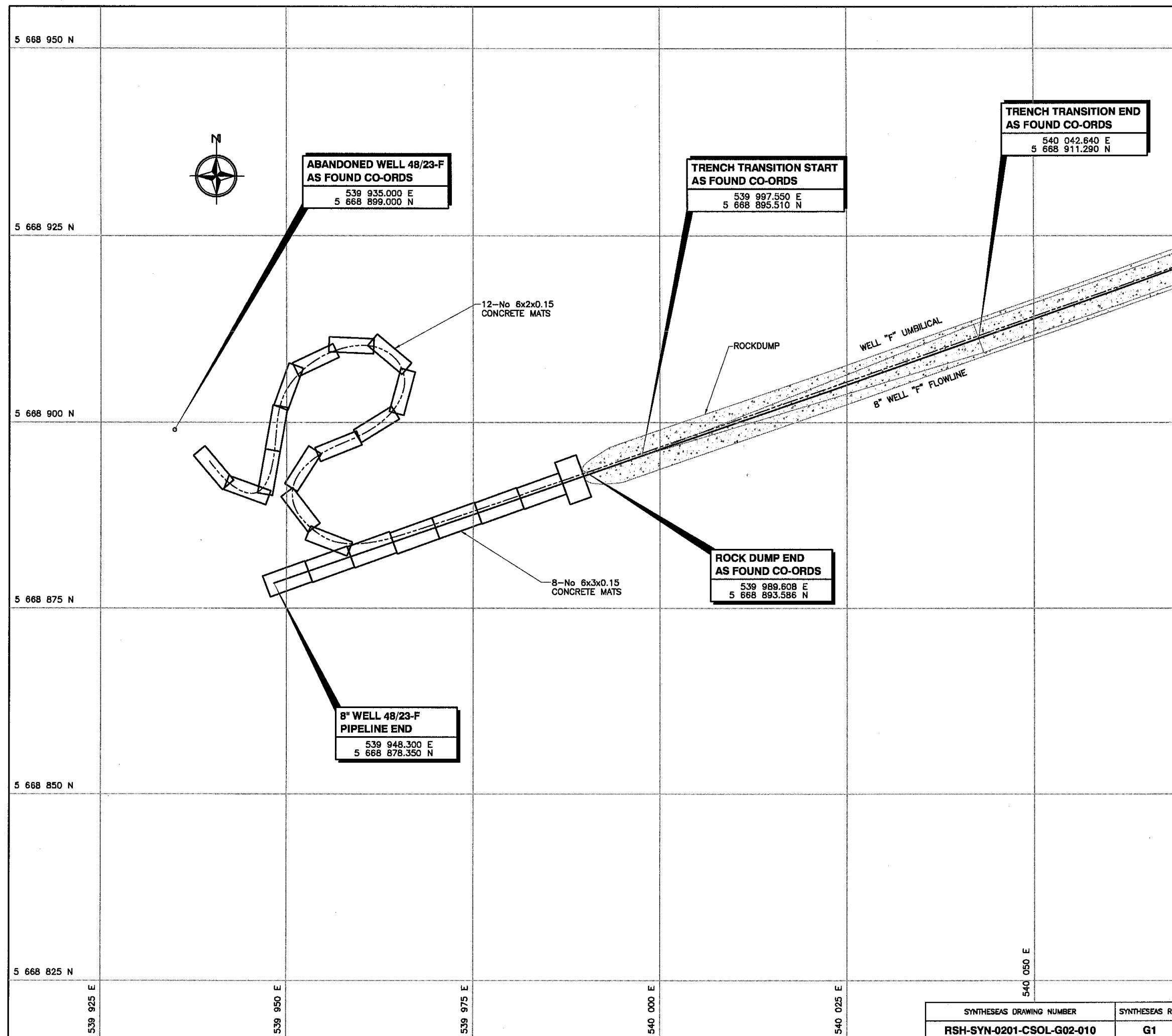
NOTES
1. ALL CO-ORDINATES ARE GIVEN IN METRES AND ARE BASED ON U.T.M. ZONE 29 INTERNATIONAL SPHEROID E050. CENTRAL MERIDIAN 9° WEST

ORIGINAL

5	24.11.03	CO-ORDS FOR WELL UPDATED	R.E.				
4	27.10.03	CLIENT DRG No ADDED	R.E.	B.W.	J.C.	J.C.	
3	22.10.03	AS BUILT INFO ADDED	R.E.	B.W.	J.C.	J.C.	
2	4.7.03	WELL 48/24-C ADDED	R.E.	A.S.	D.L.		
1	20.6.03	AS-BUILT	R.E.	R.E.	B.W.	J.C.	J.C.
REV	DATE	REVISION	ORIG.	BY	D.O.	ENG.	APP.

TECHNIP-COFLEXIP			
OFFSHORE BRANCH TECHNIP OFFSHORE UK LIMITED			
THIS DRAWING IS TECHNIP OFFSHORE UK LIMITED PROPERTY AND WILL NOT BE DISCLOSED WITHOUT THEIR AUTHORISATION			
CLIENT:			
PROJECT:		SEVEN HEADS GAS FIELD DEVELOPMENT	
TITLE:		AS-BUILD FIELD LAYOUT AT WELL "E"	
REFERENCE No.	DRAWING NUMBER	REV.	
	WK-UK002666-0028	5	
ORIG. SIZE: A1	SCALE: 1:250		

SYNTHESSEAS DRAWING NUMBER	SYNTHESSEAS REV
RSH-SYN-0201-CSOL-G02-009	G1



NOTES

1. ALL CO-ORDINATES ARE GIVEN IN METRES AND ARE BASED ON U.T.M. ZONE 29 INTERNATIONAL SPHEROID ED50. CENTRAL MERIDIAN 9° WEST

ORIGINAL

REV	DATE	REVISION	ORIG.	BY	D.O.	ENG.	APP.
4	26.11.03	WELL CO-ORDS ADDED	R.E.				
3	27.10.03	CLIENT DRG No ADDED	R.E.	B.W.	J.C.	J.C.	
2	22.10.03	AS-BUILT INFO ADDED	R.E.	B.W.	J.C.	J.C.	
1	30.6.03	AS-BUILT	R.E.	R.E.	A.S.	J.C.	J.C.

TECHNIP-COFLEXIP

OFFSHORE BRANCH
TECHNIP OFFSHORE UK LIMITED

THIS DRAWING IS TECHNIP OFFSHORE UK LIMITED PROPERTY AND WILL NOT BE DISCLOSED WITHOUT THEIR AUTHORISATION

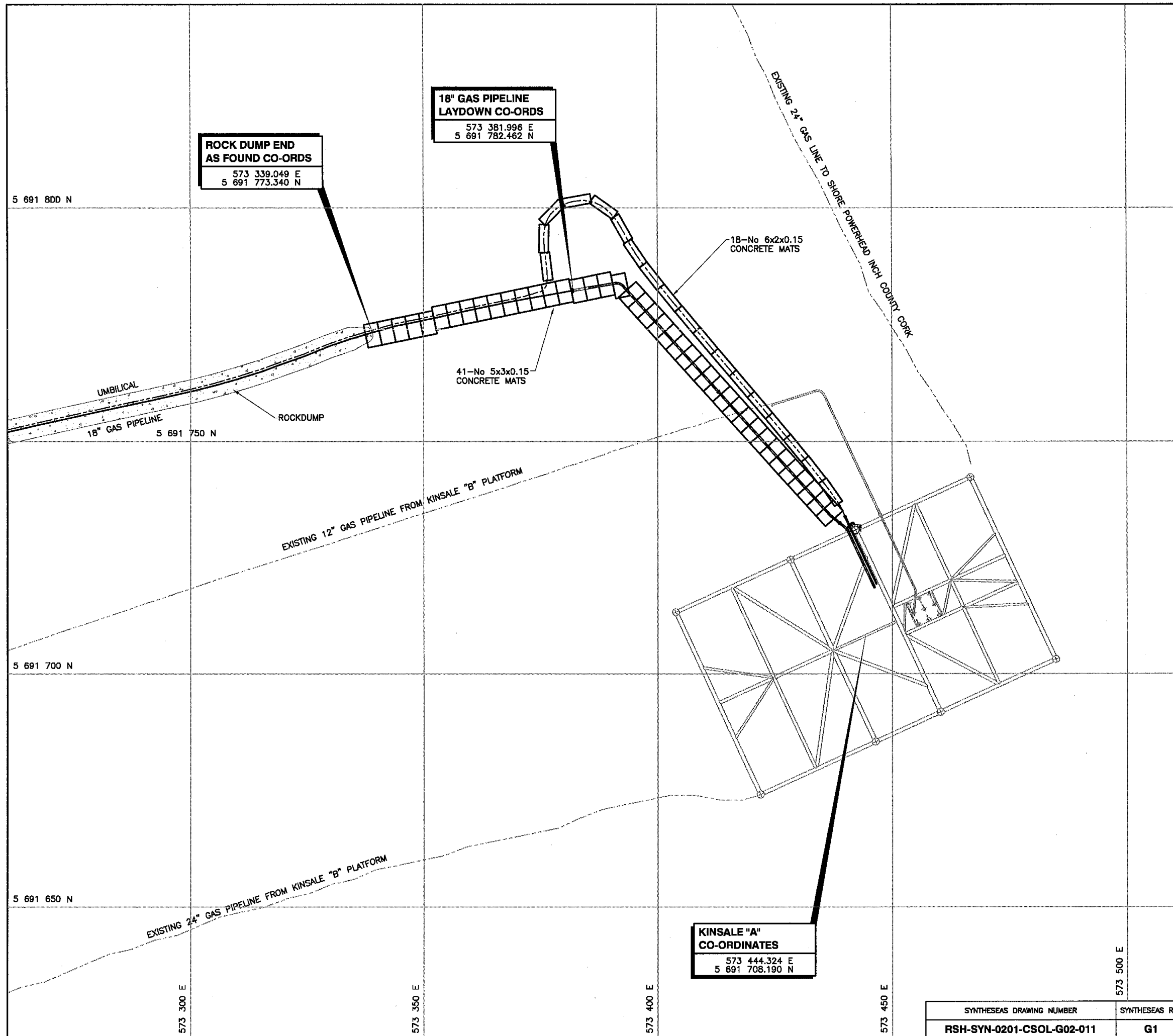
CLIENT: **RAMCO OIL & GAS LTD.**

PROJECT: **SEVEN HEADS GAS FIELD DEVELOPMENT**

TITLE: **AS-BUILD FIELD LAYOUT AT WELL "F"**

REFERENCE No.	DRAWING NUMBER	REV.
	WK-UK002666-0029	4

SYNTHESEAS DRAWING NUMBER	SYNTHESEAS REV	ORIG. SIZE:	SCALE:
RSH-SYN-0201-CSOL-G02-010	G1	A1	1:250



NOTES

ALL CO-ORDINATES ARE GIVEN IN METRES AND ARE BASED ON U.T.M. ZONE 29 INTERNATIONAL SPHEROID ED50. CENTRAL MERIDIAN 9° WEST

ORIGINAL

4	25.10.03	SYNTHESSEAS DRG No ADDED	R.E.	B.W.	J.C.	J.C.
3	27.10.03	CLIENT DRG No ADDED	R.E.	B.W.	J.C.	J.C.
2	22.10.03	AS-BUILT INFO ADDED	R.E.	B.W.	J.C.	J.C.
1	2.7.03	AS-BUILT	R.E.	R.E.	A.S.	J.C.
REV	DATE	REVISION	ORIG.	BY	O.O.	ENG.

TECHNIP-COFLEXIP

OFFSHORE BRANCH
TECHNIP OFFSHORE UK LIMITED

THIS DRAWING IS TECHNIP OFFSHORE UK LIMITED PROPERTY AND WILL NOT BE DISCLOSED WITHOUT THEIR AUTHORIZATION

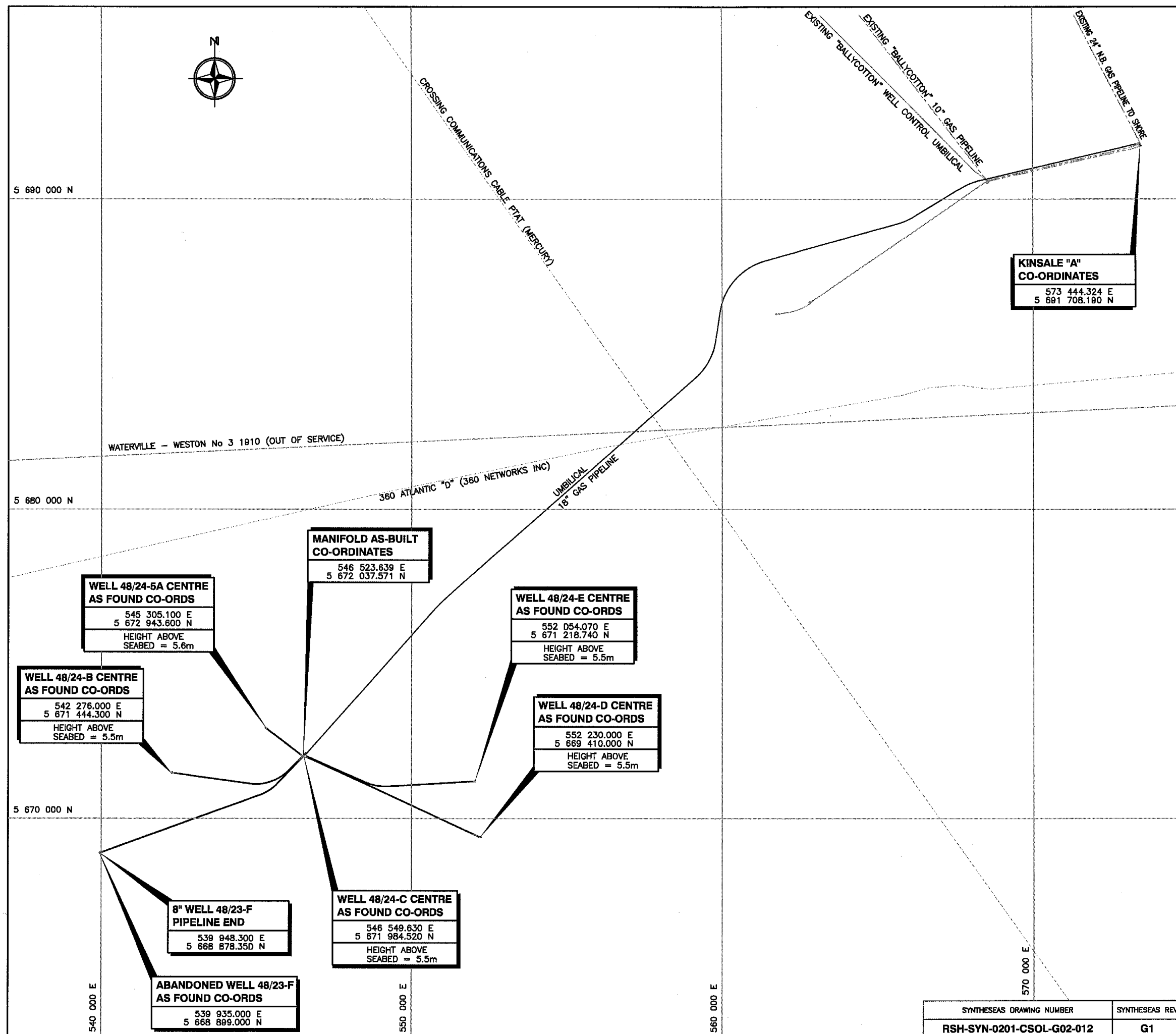
CLIENT: **RAMCO OIL & GAS LTD.**

PROJECT: **SEVEN HEADS GAS FIELD DEVELOPMENT**

TITLE: **AS-BUILT FIELD LAYOUT AT KINSALE "A"**

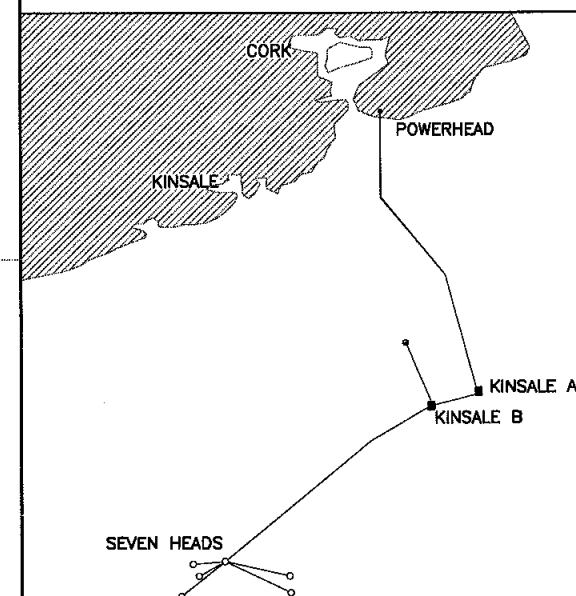
REFERENCE No.	DRAWING NUMBER	REV.
	WK-UK002666-0031	4

SYNTHESSEAS DRAWING NUMBER	SYNTHESSEAS REV	ORIG. SIZE: A1	SCALE: 1:400
RSH-SYN-0201-CSOL-G02-011	G1		



NOTES

1. ALL CO-ORDINATES ARE GIVEN IN METRES AND ARE BASED ON U.T.M. ZONE 29 INTERNATIONAL SPHEROID ED50. CENTRAL MERIDIAN 9° WEST



KEY PLAN

ORIGINAL

REV	DATE	REVISION	ORIG.	BY	D.O.	ENG.	APP.
3	26.10.03	WELL CO-ORDS UPDATED	R.E.				
2	27.10.03	CLIENT DRG No ADDED	R.E.	B.W.	J.C.	J.C.	
1	23.10.03	AS-BUILT	R.E.	R.E.	B.W.	J.C.	J.C.

TECHNIP-COFLEXIP

OFFSHORE BRANCH
TECHNIP OFFSHORE UK LIMITED

THIS DRAWING IS TECHNIP OFFSHORE UK LIMITED PROPERTY AND WILL NOT BE DISCLOSED WITHOUT THEIR AUTHORISATION

CLIENT:

RAMCO OIL & GAS LTD.



PROJECT: SEVEN HEADS GAS FIELD DEVELOPMENT

TITLE:

AS-BUILT OVERALL FIELD LAYOUT

REFERENCE No.	DRAWING NUMBER	REV.
	WK-UK002666-0033	3
ORIG. SIZE: A1	SCALE: 1:60000	

SYNTHESIAS DRAWING NUMBER

SYNTHESIAS REV

RSH-SYN-0201-CSOL-G02-012

G1