

KEM Research Question (max. 4 pages + annex)

TITLE *Review, evaluation of Brent spar decommissioning plan and second opinions*

Objective

The objective is to obtain an independent, scientific review and evaluation of the Brent decommissioning plan and related reports of Shell in relation to the critical German report on the issue. The review and evaluation are meant to support the decision process in the Dutch Ministry of Infrastructure and Water Management (IenW) to come to a Dutch view on the intention of the UK government to give permission to Shell to decommission the –end of life - production platforms Brent Bravo, Charlie en Delta in the British economic zone of the North Sea. This view has been requested under the OSPAR treaty.

State of the art, background

Decommissioning of oil and gas platforms and their removal falls under the OSPAR-agreement and regulations.

The UK intends – based on scientific reports provided by Shell – to give permission to Shell to make an exception to the platform removal obligations for the foundation parts including storage facilities of the platforms containing 640.000 m3 of contaminated water and 40.0000 m3 contaminated sediments.

Germany has objected against the intended permit to Shell, documented in critical correspondence and reports on the issue. All relevant documentation is listed below.

List of reference documents

- CONSULTATION ON THE UK GOVERNMENT’S INTENTION TO ISSUE A PERMIT UNDER PARAGRAPH 3(A) AND 3(B) OF OSPAR DECISION 98/3 FOR LEAVING IN SITU THE FOOTINGS OF THE BRENT ALPHA STEEL JACKET AND THE BRENT BRAVO, BRENT CHARLIE AND BRENT DELTA GRAVITY BASED CONCRETE INSTALLATIONS
- Shell U.K. Limited BRENT DECOMMISSIONING DEROGATION ASSESSMENT
An Assessment of Proposals for the Disposal of the Disused Steel and Concrete Substructures of the Brent Field Installations Shell Brent Decommissioning Project; Independ Review Group; Final Report; 3 February 2017
- Review of the Shell/Exxon Brent Decommissioning Derogation Assessment and of the corresponding proposal by UK BEIS. Report Prepared by Scientia et Sagacitas Ltd. Aberdeen United Kingdom May 2019
- Correspondence between the United Kingdom and Germany regarding this issue
- OSPAR Decision 98/3
- Additional information is available on: <https://www.shell.co.uk/sustainability/decommissioning/brent-field-decommissioning.html>

Research Question

SodM has received via the Ministry of Infrastructure and Water Management the decommissioning plan of Shell and the German critical report. Considering the sensitivities in the North Sea, SodM seeks to have these externally reviewed prior to advising the Minister of Infrastructure and Water Management on the safety and environmental issues surrounding this project.

Research questions to be answered by the evaluation and review:

1. Is the assessment method used by Shell in accordance with OSPAR Decision 98/3 Annex 2?
2. Has Shell made sufficient effort to determine the composition of the contents of the storage tanks?
3. Is it technically possible to remove the contents of the storage tanks and process them on land? If so, what are the environmental and safety related effects of this? To what extent is it possible to limit or mitigate these effects?
4. Is it environmentally and safety wise better to leave the content in the storage tanks?

5. Has Shell taken the current State of Technology as the basis for its investigations?

6. Are the uncertainties mentioned in the investigation reports justified?

7. Finally, any recommendations or advise with respect to the proposed plan to be taken into account by the Ministry in formulating an opinion on the matter?

Deliverables expected

Review document addressing the general and specific research questions related to the 2 reports.
Recommendation for the formulation of a position of The Netherlands

Timeline

1-3 months.

Expected use

The ministry of Infrastructure and Water will use the evaluation result in their formulation of a Dutch position on the UK position.

Expertise and tools preferred for the team

Expertise in environmental hazard and risk of analysis offshore operations, installations and decommissioning.

Quality assurance, Organisational and communication requirements

Review done by KEM expert panel.

Remarks and Suggestions

Potential contractors should have a proven track record in assessing platform abandonment operational and long term risks.

References

See "state of the art" section.