

Subject: Kinsale Head Consent Application no. 3” and “Seven Heads Application no. 2

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To whom it concerns,

We note the application for consent to decommission the Kinsale gas export pipeline and would like to make a proposal that the pipeline is not decommissioned as planned but rather kept in a preservation state for further use. Specifically, we would suggest that the landfall is not grouted, and the presentation state is left full of inhibited seawater or some other preservation medium. There are potential reuse options that have not been fully assessed yet.

Section 3.3 of the consent application notes that the *Kinsale Area facilities (including pipelines and umbilicals) were 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 have been suitable for re-use, depending on the service, particularly the main Kinsale and Seven Heads export pipelines.. 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. An assessment of the alternatives and other uses are outlined in full at Sections 3.3 and 3.4 of the EIAR. Following discussions with DECC regarding potential future use of the pipelines, it was the position of the Department that Consent Application 3 should be submitted on the basis that arrangements are not to be made to provide for the future use of the pipelines. Kinsale Energy is proceeding with decommissioning on the basis that none of the pipelines or umbilicals will be re-used.*

Section 3.3 of the EIAR considers hydrocarbon production, CCS and wind energy production. Specifically on wind energy production:

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.

We consider that the future wind energy options have not been fully considered as using the pipeline as a conduit for HV cables could be feasible for selected sections such as the landfall area to avoid further beach trenching. This requires further assessment and is not covered directly in the current EIAR. We do have a project in development in potentially close proximity to the Kinsale Area facilities. In addition, there may be the potential to reuse the pipeline for hydrogen transportation as either part of an offshore hydrogen reservoir storage facility or as a buffer storage in itself. We believe these options should be considered fully before any permanent state of decommissioning is enacted.

Your sincerely,



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