

Our Ref: 01.08.06.15/481C
UKOP Doc Ref:1181331



Offshore Petroleum Regulator
for Environment & Decommissioning

REPSOL SINOPEC RESOURCES UK LIMITED
11-12 ST. JAMES'S SQUARE
LONDON
SW1Y 4LB

Registered No.: 00825828

Date: 17th December 2021

Department for Business, Energy
& Industrial Strategy

AB1 Building
Crimon Place
Aberdeen
AB10 1BJ

Tel [REDACTED]

Fax [REDACTED]

www.gov.uk/beis
bst@beis.gov.uk

Dear Sir / Madam

**THE OFFSHORE OIL AND GAS EXPLORATION, PRODUCTION, UNLOADING
AND STORAGE (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS
2020
CLAYMORE**

A screening direction for the project detailed in your application, reference PR/2207/0 (Version 2), dated 16th December 2021 has been issued under regulation 6 of the above Regulations. The screening direction notice, and any relevant conditions and comments are attached. A copy of this screening direction will be forwarded to the application consultees, the Oil and Gas Authority and published on the gov.uk website.

If you have any queries in relation to this screening direction or the attachments, please do not hesitate to contact [REDACTED] on [REDACTED] or email the Environmental Management Team at bst@beis.gov.uk.

Yours faithfully



**THE OFFSHORE OIL AND GAS EXPLORATION, PRODUCTION, UNLOADING
AND STORAGE (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS
2020**

**SCREENING DIRECTION CONFIRMING THAT AN ENVIRONMENTAL IMPACT
ASSESSMENT IS NOT REQUIRED**

CLAYMORE

PR/2207/0 (Version 2)

Whereas REPSOL SINOPEC RESOURCES UK LIMITED has made an application dated 16th December 2021, under The Offshore Oil and Gas Exploration, Production, Unloading and Storage (Environmental Impact Assessment) Regulations 2020, and whereas the Secretary of State has considered the application and is satisfied that the project is not likely to have a significant effect on the environment; in exercise of the powers available under regulation 6, the Secretary of State hereby directs that the application for consent in respect of the project need not be accompanied by an Environmental Impact Assessment, provided that the project is carried out as described in the application for the screening direction and in accordance with the conditions specified in the attached schedule.

In giving a screening direction under regulation 6 of the above Regulations, the Secretary of State accordingly gives his agreement to the Oil and Gas Authority to the grant of consent for the project as detailed in the application.

Effective Date: 17th December 2021



THE OFFSHORE OIL AND GAS EXPLORATION, PRODUCTION, UNLOADING AND STORAGE (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2020

SCHEDULE OF SCREENING DIRECTION CONDITIONS

The grant of this screening direction is conditional upon the screening direction holder complying with the following conditions.

1 Screening direction validity

This screening direction shall be valid from 1 January 2022.

2 Change to production level(s)

The holder of the screening direction shall ensure that the change in the level(s) of production do not exceed the amended level(s) detailed in the application for the screening direction, and in the application for consent relating to the approval for the getting of petroleum issued under the relevant production licence Model Clause.

3 Prevention of pollution

The holder of the screening direction must ensure that appropriate measures are taken to minimise discharges, emissions and waste, in particular through the appropriate use of technology; and to ensure that necessary measures are taken to prevent incidents affecting the environment or, where they occur, to limit their consequences in relation to the environment.

4 Inspections

Should the Department consider it necessary or expedient for an inspector appointed by the Secretary of State to investigate whether the conditions of the screening direction are being complied with, the holder of the screening direction shall afford the inspector with such facilities and assistance as the inspector considers necessary to exercise the powers conferred by the regulations. The holder of the screening direction shall additionally ensure that copies (electronic or paper) of the screening direction and any other relevant documents are available for inspection by the inspector at:

- a) the premises of the holder of the screening direction; and
- b) the facilities undertaking the project covered by the screening direction.

5 Check monitoring

Should the Department consider it necessary or expedient to undertake an independent monitoring programme to assess the impact of the project covered by the screening direction, the screening direction holder shall afford the Department



with such facilities and assistance as the Department considers necessary to undertake the work.

6 Atmospheric emissions returns

Following completion of the project covered by the screening direction, the holder of the screening direction shall report all relevant atmospheric emissions, such as combustion emissions, using the appropriate Environmental Emissions Monitoring System (EEMS) reporting forms.

7 Unauthorised deposits

Following completion of the project covered by the screening direction, the holder of the screening direction shall recover any materials accidentally or temporarily deposited on the seabed, such as debris, temporary containers, structures or deposits, or scientific instruments, and shall return the materials to land. If it is not possible to recover any of these deposits, full details of the materials remaining on the seabed must be reported to the Department in accordance with the requirements of Petroleum Operations Notice No.2 (PON2).

8 Screening direction variation

In the event that the holder of the screening direction proposes changes to any of the particulars detailed in the application for a screening direction, the holder must notify the Department immediately and submit an application for a post screening direction amendment. The post screening direction must be in place prior to the amended proposals taking effect.

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COMMENTS ON THE APPLICATION FOR SCREENING DIRECTION

Section 1

The attention of screening direction holders is drawn to the following provisions regarding The Offshore Oil and Gas Exploration, Production, Unloading and Storage (Environmental Impact Assessment) Regulations 2020.

1) You are deemed to have satisfied yourself that there are no barriers, legal or otherwise, to the carrying out of the project covered by the screening direction. The issue of a screening direction does not absolve the screening direction holder from obtaining such authorisations, consents etc that may be required under any other legislation.

2) The Department would draw your attention to the following comments:

The Department has no comments.

3) All communications relating to the screening direction should be addressed to:

Out-of-hours emergency screening direction variations:

Telephone Met Office out-of-hours service (0330 135 0010) and ask to be connected to the Department's On-call Response Officer (Offshore Environmental Inspectorate).

Routine communications

bst@beis.gov.uk

or

Offshore Petroleum Regulator for Environment & Decommissioning
Department for Business, Energy & Industrial Strategy
AB1 Building
Crimon Place
Aberdeen
AB10 1BJ

Tel [REDACTED]

Fax [REDACTED]



SCHEDULE OF SCREENING DIRECTION DECISION REASONS

The Secretary of State has decided that, based on the information provided, the project is not likely to have a significant effect on the environment. The main reasons for this decision are:

1) Decision reasons

The following provides a summary of the assessment undertaken by OPRED to determine whether an Environmental Impact Assessment is required for this project, summarises the information considered, the potential impacts and sets out the main reasons for the decision made. In considering whether an Environmental Impact Assessment is required or not, the following have been taken into account:

- a) The information provided by the developer.
- b) The matters listed in Schedule 5 of The Offshore Oil and Gas Exploration, Production, Unloading and Storage (Environmental Impact Regulations 2020) (the Regulations).
- c) The results of any preliminary verifications or assessments of the effects on the environment of the project; and
- d) Any conditions that the Secretary of State may attach to the agreement to the grant of consent.

Characteristics of the Project

Having regard, in particular, to the matters identified at paragraphs 1(a) to (g) of Schedule 5 to the Regulations, the characteristics of the project include the following:

Summary of the project:

Increase in oil production from the Claymore field.

Description of project

This project consists of an increase in oil production of less than 500 tonnes per day at the Claymore field due to the proposed re-purposing of the C90 existing well to drill a side-track into the Northern Area Claymore field in 2022, workover to improve production at C71 well in 2023 and proposed drilling of a Central Area Claymore infill well in 2024. The increase in production is proposed to be in the years 2023 and 2024, although production consent has been applied for from 2022 - 2024.

No cumulative impacts are expected to occur with any other existing or approved projects.



There is no change to the assessment of a major accident. The developer has control measures in place to reduce the risk of a major accident occurring and the probability of such an event occurring is very low.

It is not considered to be likely that the project will be affected by natural disasters.

There is not likely to be any significant impact of the project on population and human health.

Location of the Project

Having regard in particular to the matters identified at paragraphs 2(a) to (c) of Schedule 5 to the Regulations, the environmental sensitivity of geographical areas likely to be affected by the project has been considered as follows:

The project area is in Block 14/19 in the Central North Sea (CNS) approximately 130 kilometres (km) from the Scottish coast of the UK and 102 km from the UK/Norway median line, in an approximate water depth of 111 metres (m). Typical current speed is 0.1ms⁻¹ for both the Atlantic and Fair Isle Dooley current. Surface tidal currents ranges between 0.11 to 0.5ms⁻¹.

Sediments around the wider Claymore platform are composed of sands, gravels and muds including the muddy beds of the Fladen and Witch Grounds. The platform is located to the northwest of the Witch Grounds Formation in an area of deep circalittoral mud. Surveys at sites located 6, 13 and 15km from the platform completed in 2020 showed 'sandy mud' and 'deep circalittoral mud'.

Detailed review of the results from the closest survey location 6km from the platform found 'sea pens and burrowing megafauna in circalittoral fine mud', circalittoral mixed sediment and circalittoral fine mud. Burrowing megafauna including Norway lobster and two sea pen species, *Virgularia mirabilis* and *Pennatula phosphorea* were widespread across site surveys. Burrow counts and images found that many locations met the criteria for the OSPAR listed as threatened/ declining habitat 'sea-pen and burrowing megafauna communities', a UK Habitat Feature of Conservation Importance and UKBAP listed habitat 'mud habitats in deep water'. Juvenile ocean quahog were also found at these survey sites.

Benthic communities of the central North Sea are dominated by polychaetes and bivalves with brittlestars and more dispersed crab species. The survey in the vicinity of the platform found other megafauna including anemones, crustaceans, tubes, shrimp, ling and anthozoans.

The closest areas protected for Annex I habitat are the Braemar Pockmarks Special area of Conservation (SAC) designated for the protection of submarine structures made by leaking gas 112km away and the Scanner Pockmark designated for a large seabed depression 70 km away. These are now referred to as sites of national importance retaining the same protection under UK as EU legislation. Pockmark distribution correlates to the Witch Ground. The Claymore platform is located



northwest of this area.

Fish spawning and nursery activity occur in the area, which will coincide with the operations. The area is not suitable for herring spawning.

Seabird vulnerability is highest in May and June, moderate September, October and December and lower early in the year. The surrounding areas include higher and lower sensitivity compared to block 14/19 in May and June but similar lower sensitivity between January and March.

Two cetacean species have been sighted specifically in the platform area, white-beaked dolphin and harbour porpoise however eight species are found in the wider area. All species are found in low to high densities throughout the year.

Block 14/19 falls within International Council of the Sea (ICES) rectangle 45E9, and fishing in this area concentrates on pelagic species. Fishing activity is at its lowest from January to May. The period of greatest fishing activity is July but the largest catch is October with the highest value.

Claymore platform is located in a 500m statutory safety exclusion zone with a low amount of shipping in the area. The project location is not within a military activity zone, there is no submarine cables, aggregate extraction, renewable development and the nearest oil and gas installation is 19km away.

Given the location of the project, it is not likely that the areas identified at paragraphs 2(c)(i), (iii), (iv), (vi), (vii) or (viii) of Schedule 5 to the Regulations will be affected by the project.

Type and characteristics of the potential impact

In accordance with paragraph 3 of Schedule 5 to the Regulations, the likely significant effects of the project on the environment have been considered. Potential effects of the atmospheric emissions on the environment from the activities associated with the project were assessed. Other than the matters considered further below, there is not likely to be any significant impact of the project on population and human health.

Proposed production from the C90, C71 and Central Area Claymore infill well is unlikely to require any change to current helicopter and vessel trips to the platform with no change in diesel consumption and associated atmospheric emissions.

There will be no change in flaring. Combustion plant remains the same and will run more efficiently being oversized for current service. There will be no modifications to the platform production system. There is not anticipated to be any change in atmospheric emissions and no likely significant impact upon the environment.

There is not anticipated to be any change in chemical requirements for production other than chemicals with zero discharge applied to the oil export pipeline. The



proposed increase in oil production is associated with a decrease in produced water volume between 2021 and 2023 with a minor increase in 2024. The volume in 2024 is lower than 2021. This trend will be mirrored by associated changes in de-oiler and super clarifier to maintain the concentration of oil in water to the permitted discharge limit. Chemicals are risk assessed to ensure no significant impact upon the environment.

The platform is located approximately 30km from other active development and 100km from the median line with Norway. Emissions and discharges are not expected to have significant cumulative or transboundary effects.

It is considered that the increase in oil production from the Claymore field is not likely to have a significant impact on other offshore activities or other users of the sea, the seabed, marine life or cetacean species and no cumulative impacts are expected to occur.

Decision

Taking the above considerations into account, the Secretary of State has concluded that the project is not likely to have a significant impact on the environment and that an environmental impact assessment is not required.

2) Mitigation of significant effects

The following are features of the project or measures envisaged that the developer has proposed to avoid or prevent what might otherwise have been significant adverse effects on the environment:

Not applicable