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Offshore Petroleum Regulator
for Environment & Decommissioning

BP EXPLORATION OPERATING COMPANY LIMITED
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Registered No.: 00305943

Date: 23rd February 2021

Department for Business, Energy
& Industrial Strategy

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Dear Sir/ Madam

**THE OFFSHORE OIL AND GAS EXPLORATION, PRODUCTION, UNLOADING
AND STORAGE (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS
2020
CLAIR-RIDGE [Part of CLAIR], Clair Ridge Platform - Planned Production Well
206/08a-BS2AU3P2 (B 11)**

A screening direction for the project detailed in your application, reference DR/2059/0 (Version 3), dated 18th February 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

Signature valid

Digitally signed by Environmental Section
Date: 2021.02.23 15:58:57 GMT
Reason: On behalf of the Department for Business
Energy and Industrial Strategy
Location: The Department for Business Energy
and Industrial Strategy

**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**

**CLAIR-RIDGE [Part of CLAIR], Clair Ridge Platform - Planned Production Well
206/08a-BS2AU3P2 (B11)**

DR/2059/0 (Version 3)

Whereas BP EXPLORATION OPERATING COMPANY LIMITED has made an application dated 18th February 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: 23rd February 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

The screening direction shall be valid from 24 February 2021 until 31 July 2021.

2 Commencement and completion of the project

The holder of the screening direction must notify the Department for Business, Energy & Industrial Strategy (hereinafter called the 'Department') of commencement and completion of the project within two days:

- a) of commencement of the project and
- b) of completion of the project.

Notification should be sent by email to the Environmental Management Team Mailbox: bst@beis.gov.uk

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, extended well test emissions or flaring and venting emissions relating to a well test, using the appropriate Environmental Emissions Monitoring System (EEMS) reporting forms. In the case of atmospheric emissions relating to drilling projects undertaken from a fixed installation, they should be included in the annual EEMS reporting forms for the fixed installation.

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.

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:

n/a

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 

SCHEDULE OF SCREENING DIRECTION DECISION REASONS

This document provides a summary of the assessments undertaken by OPRED to determine whether an Environmental Impact Assessment is required for this project. This document 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: The Development Well 206/8a-BS2AU3P2 (B11), will be drilled from the Clair Ridge Platform (CRP) with operations expected to take 73 days. No cumulative impacts are expected to occur between this project and other existing projects due to the distance between them.

The well will be drilled with a combination of Water Based (WBM) and Low Toxicity Oil Based Mud (LTOBM). Cuttings from the WBM sections will be discharged at CRP, whilst cuttings generated in the LTOBM sections will be re-injected. If re-injection is unavailable, then the cuttings will be returned to shore for treatment and disposal.

Drilling of an oil producing well was assessed in the original scope for the Clair Ridge Development Environmental Statement (ES) which was approved 27th June 2011. A total of 36 wells are planned over approximately 12 years, with BS2AU3P2 (B11) the 9th well to be drilled.

It is not considered to be likely that the project will be affected by natural disasters. The risk of a major accident such as a well blowout has been assessed. 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.

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 CRP is located approximately 55 kilometres (km) west of Shetland and 92 km south east of the United Kingdom-Faroes median line. The operations are part of the existing Clair Ridge Development and were included in the original scope of the ES. This is the 9th well to be drilled at the development.

The project is located in an area characterised by coarse sediment and sand and muddy sand with a water depth of 143 metres (m). Mean monthly significant wave heights for the area range between 3.5 m and 4.5 m in the winter months, and 1.5 m and 2 m in the summer months. Surveys indicated that areas were predominately classified as Sublittoral coarse sediment. Additional habitats were identified in a lesser extent, including Sublittoral sand and Sublittoral Mixed Sediment. Survey work found that the sediments generally support a species-rich and relatively abundant macrofauna. Highly populated with juveniles, the total proportional taxa contribution around Clair Ridge consists mainly of annelids (63.4%), arthropods (15.9%), molluscs (14.6%), echinoderms (3.7%) and other (2.4%). This dominance of annelid taxa is broadly typical of the northeast Atlantic area. There is no evidence of threatened or declining species listed under OSPAR or Priority Marine Features (PMF). No species or habitats of conservation significance under the Offshore Petroleum Activities (Conservation of Habitats) Regulations 2001 (as amended) were observed within the survey area. The closest recorded PMFs are deep-sea sponge aggregations and ocean quahogs aggregations located approximately 23 km west and 69 km east of the CRP, respectively.

Two wrecks have been identified within 7 km of the CRP. No aggregate dredging and disposal sites, sites of marine archaeological interest or planned offshore renewable energy developments have been identified within 40 km of the CRP.

Given the location of the project, it is not likely that the areas identified at paragraphs 2(c)(i), (iii), (iv), (vi), (vii) 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 on the environment from the activities associated with the project were assessed, including impacts arising from atmospheric emissions, seabed disturbance, physical presence, planned discharges and accidental spills.

Other than the matters considered further below, there is not likely to be any significant impact of the project on population and human health.

There is a 500 m radius safety zone around the CRP, excluding unauthorised access

of vessels and prohibiting access to fishing vessels. No additional impacts are identified as part of the operations at BS2AU3P2 (B11).

Seabed disturbance from the discharge of water-based mud drill cuttings will impact a total area of 0.000228 km². Seabed disturbance could result in the smothering and mortality of benthic fauna which will result in some short term temporary impacts however the benthic communities are expected to regenerate the area impacted by drill cuttings over time. The impacts from seabed disturbance have been assessed as not likely to have significant effect.

Discharge of chemicals associated with the water-based mud and the risk posed to the marine environment has been assessed as not having a likely significant effect. Chemicals associated with low toxicity oil based mud will be re-injected or returned to shore for treatment and disposal, resulting in no significant impact to the offshore environment.

Operations at BS2AU3P2 (B11) may result in the discharge of brine contaminated with LTOBM. No discharge will take place until it has been confirmed that the concentration of oil in water is below 30 mg/l, and a maximum of 300 m³ of water with a maximum of 9 kg of oil may be discharged. This discharge is not considered to have a likely significant effect on the environment.

There are no expected transboundary effects from the operations at BS2AU3P2 (B11). The nearest boundary (UK/Faroes Median Line) is located approximately 92 km north west of the operations. It is not considered likely that any planned operational discharges (cuttings, chemicals or base oil) will be detectable at this distance from CRP.

A worst-case major accident scenario resulting from a potential well blow-out was modelled and assessed. The maximum hydrocarbon blow-out rate of oil from BS2AU3P2 (B11) is 9,205 m³/day (approximately 8,371 tonnes/day) for a maximum of 140 days. The worst-case release within the Clair Ridge Field based on the S2U3I2 well is 11,721 m³/day for 140 days resulting in a total release of up to 1,640,900 m³. The stochastic modelling from the S2U3I2 well suggests that the most likely direction of travel is towards the north and east, with beaching most likely on the Shetland Isles. However, there is also a risk of beaching on the coastlines of Fair Isle, Faroe Islands, Denmark, Norway, and the UK coast. The modelling results indicate that the minimum time for beaching, on the west coast of Shetland is approximately 1 hour, with a probability of beaching approaching 100%. Beaching on the northern coast of the Scotland mainland would occur after a minimum of 23.1 hours, with a probability of beaching of 35%. The proposed measures to prevent and respond to any release, including a worst-case scenario have been include in the Clair Ridge Oil Pollution Emergency Plan. 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.

Operations at BS2AU3P2 (B11) will use the existing platform power generation. Atmospheric emissions resulting from drilling at CRP were assessed as part of the

ES and are considered to have no significant impact on the environment.

Operations at BS2AU3P2 (B11) will be conducted from the existing CRP such that there is no increase in the infrastructure footprint. No cumulative impacts are expected to occur between this project and other existing projects due to the distance between them. Impacts from the discharge of cuttings, including potential cumulative impacts from the 36 Claire Ridge wells were considered and as the drilling will occur over a 12 year period and will be dispersed over time, impacts were concluded to be localised and not significant.

Two wrecks have been identified within 7 km of the CRP and the operations at BS2AU3P2 (B11) are not likely to have a significant impact on them.

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.