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Offshore Petroleum Regulator  
for Environment & Decommissioning

BP EXPLORATION OPERATING COMPANY LIMITED  
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Registered No.: 00305943

Date: 13th April 2021

Department for Business, Energy  
& Industrial Strategy

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[bst@beis.gov.uk](mailto:bst@beis.gov.uk)

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 (B11)**

I refer to your amended application dated 13th April 2021, reference DR/2059/2 (Version 1).

It has been determined that the proposed changes to the project is not likely to result in a significant effect on the environment, and therefore an environmental impact assessment is not required.

A screening direction is therefore issued for the changes to the project. An amended schedule of conditions, comments, and main reasons for the decision on the amended application, 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](mailto: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**

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

**DR/2059/2 (Version 1)**

Whereas BP EXPLORATION OPERATING COMPANY LIMITED has made an application dated 13th April 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: 13th April 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](mailto: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:

Not applicable.

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]



## **SCHEDULE OF SCREENING DIRECTION DECISION REASONS**

### **1) 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**

This screening direction (ref: DR/2059/2) relates to a change to the project for which a screening direction was previously given (ref: DR/2059/0).

Having regard, in the 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 the length of the 8.5" section of the Development Well 206/8a-BS2AU3P2 (B11) by 489 m.

### **Description of the Project**

The original screening direction (DR/2059/0) relates to the drilling of Development Well 206/8a-BS2AU3P2 (B11) from the Clair Ridge Platform (CRP).

That project involved the well being drilled with a combination of water based (WBM) and low toxicity oil based mud (LTOBM). Cuttings from the WBM sections were discharged at CRP, with cuttings generated in the LTOBM sections being reinjected. If re-injection is unavailable, then the cuttings were to be returned to shore for treatment and disposal. The drilling was to include a 32" section, a 16" section, a



12.25 " section and an 8.5 " section.

This screening direction (ref: DR/2059/2) relates to an extension to the depth of the drilling activities. Following completion of the drilling covered by the original screening direction BP Exploration Operating Company Limited are requesting to extend the 8.5" section by 489 m, increasing the measured depth below rotary table (MDBRT) from 3,311 m to 3,800 m and increasing the true vertical depth below rotary table (TVDBRT) from 1,802 m to 1,950 m. The increased drilling will add four days to the operations.

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 remains 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 a result of the extended drilling at 206/8a-BS2AU3P2 (B11).

The extended 8.5" section will be drilled with LTOBM, with drill cuttings being reinjected or returned to shore for treatment and disposal. There will be no additional impacts to seabed disturbance.

There are no expected transboundary effects from the extended operations at 206/8a-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 discharge will be detectable at this distance from CRP.

The worst-case major accident scenario resulting from a potential well blow-out modelled and assessed as part of the original screening application remains relevant. The maximum hydrocarbon blowout rate of oil from 206/8a-BS2AU3P2 (B11) is 9,205 m<sup>3</sup>/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 m<sup>3</sup>/day for 140 days resulting in a total release of up to 1,640,900 m<sup>3</sup>. 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 included 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.

The extended operations at 206/8a-BS2AU3P2 (B11) will lead to additional power generation requirements using existing platform power generation. Atmospheric





emissions resulting from drilling at CRP were assessed as part of the ES and the additional emissions associated with the extended operations at 206/8a-BS2AU3P2 (B11) are considered to have no significant impact on the environment.

The extended drilling at 206/8a-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.

Two wrecks have been identified within 7 km of the CRP, the extended drilling operations at 206/8a-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.

## **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.