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Offshore Petroleum Regulator  
for Environment & Decommissioning

SHELL U.K. LIMITED  
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LONDON  
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Registered No.: 00140141

Date: 23rd 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  
BRIGANTINE D PRODUCTION INCREASE - YEARS 2021-2024**

A screening direction for the project detailed in your application, reference PR/2097/0 (Version 2), dated 23rd April 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](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**

**BRIGANTINE D PRODUCTION INCREASE - YEARS 2021-2024**

**PR/2097/0 (Version 2)**

Whereas SHELL U.K. LIMITED has made an application dated 23rd 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: 23rd 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**

This screening direction shall be valid from 23 April 2021.

#### **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.



## 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:

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



## **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 assessments 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 production of gas at the Brigantine D field for the years 2021-2024.

### **Description of the Project**

Proposed well treatment at the field will enable an increase in produced gas from the Brigantine D field for the years 2021-2024. The well treatment options relate to foam batch treatment with nitrogen squeeze, nitrogen gas lift, and coil tubing clean-out. The production change and enabling works will not require modifications to the Brigantine platform or processing facilities. Transit of support vessels will not be altered as a result of the production change. No alteration in the quantities of processing chemicals is anticipated at the Lemman installation where processing of Brigantine D gas takes place.



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

There is not likely to be any significant impact of the project on population and human health. It is not considered likely that the project will be affected by natural disasters. No pollution or nuisances are foreseen from the project. There is an associated waste streams linked to the project in the form of entrained oil in water, but this will be processed, treated and disposed of accordingly via the produced water discharge stream.

### **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 is located in an offshore oil and gas licenced area, approximately 48 km east from the English coastline and 65 km west of the UK / Netherlands median line, in an area where water depth is approximately 39 m and the seabed type is characterised as circalittoral fine sand. The predominant current in the location originates from Atlantic inflow from the west, resulting in a south-easterly movement along the coast towards the English Channel. The project is located in the southern North Sea SAC (designated for protection of harbour porpoise) and the North Norfolk Sandbanks and Saturn Reef SAC (designated for protection of sandbanks and reefs).

Site-specific surveys identified the seabed as consisting of circalittoral fine sand. Species of visible epifauna varied little between the different identified habitats; however, higher numbers of individuals were recorded in areas with increased coarse material and *Saballeria spinulosa* aggregations. Epifauna was generally dominated by motile fauna including the common sea star (*A. rubens*), brittle stars (*Ophiura albida*), hermit crabs (*Pagurus* spp.), edible crabs (*C. pagurus*), and velvet swimming crabs (*Necora puber*). The most common fish encountered were dragonets (*Callionymus* sp.), pogges (*A. cataphractus*), and gobies (*Gobiidae*). Flatfish (*Pleuronectiformes*) lesser spotted dogfish (*Scyliorhinus canicula*) and a rock gunnel (*Pholis gunnellus*) were also observed. Areas of *S. spinulosa*, coarse material and the anthropogenic debris observed during the 2012 ROV investigation displayed an increase in sessile organisms such as athecate hydroids and plumose anemones (*M. senile*), the latter of which is indicative of high current speeds at the seabed.

*S. spinulosa* at the location has been observed in fluctuating aggregations. Importantly the 'reefiness' examination of the aggregations was seen to fluctuate around the time installation of oil and gas infrastructure had taken place. Interestingly the robustness and quality of the reefs observed improved after the installation of infrastructure had taken place, showing that the habitat is resilient to such activity.



The project works will take place during peak spawning of cod, mackerel, plaice, sprat and Norway lobster. Sightings of cetaceans have been recorded during the period for which the project works are planned, but sightings are more frequent during summer months. Seabird sensitivity is described as extremely high during winter months. The project area is not within a commonly fished ground and fishing effort is predominantly focussed on demersal species. The area is described as a low intensity fishing area. There is a large amount of other oil and gas infrastructure in the surrounding area. The project location is not within a military activity zone, aggregate extraction location, or any renewable energy infrastructure projects.

Given the location of the project, the areas identified at paragraphs 2(c)(i), (iii), (iv), (vi), (vii) and (viii) of Schedule 5 are not likely to 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 to the environment from the activities associated with the change to the project were assessed, with particular focus on the predominant impacts resulting from atmospheric emissions, planned discharges and accidental events.

The increase in produced gas from the field for 2021-2024 will not result in any routine flaring nor will any increase in venting at the processing installation be required (noting that venting is permissible for safety reasons). No power generation changes are anticipated for the increase in production of gas and there is no alteration to support vessel requirements. Atmospheric emissions from the change in production will therefore not have a significant impact on the environment.

Alterations in the existing production chemical use and discharge associated with the process of gas from the field will be expected. But the alterations will not change the existing fate modelling and risk to the environment. Therefore, no significant impact from chemical use and discharge is expected. Oil in water from the associated hydrocarbon production at the field is discharged to sea, but no changes in the expected concentration or environmental effect are expected compared with current production experience. The increase in gas from the field has no associated liquid hydrocarbon change attributed to it. The existing accidental event spill modelling is applicable and due to the extremely low volumes of oil released in such an unplanned event there is no significant impact likely to occur. The asset is included in an emergency response plan, and this would be enacted in the event of a major accident/spill scenario. The receptors outlined in the location of the project section, will not be affected by the increase in production from the field.

There are no expected transboundary impacts as a result of the project, and no cumulative impacts have been identified given the other known existing and approved projects in the wider area.

### **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.