Our Ref: 01.01.01.01-4677U
UKOP Doc Ref:1144972

Offshore Petroleum Regulator
for Environment & Decommissioning

INEOS UK SNS LIMITED
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Registered No.: 01021338

Date: 24th June 2021

Department for Business, Energy
& Industrial Strategy

AB1 Building
Crimon Place
Aberdeen
AB10 1BJ

Tel [redacted]
Fax

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
BREAGH, Breagh Platform, DRILLING PRODUCER WELL 42/13a- 42/13a-SE planned well

A screening direction for the project detailed in your application, reference DR/2125/0 (Version 3), dated 16th June 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 Not Verified
Digitally signed by Environmental Section
Date: 2021.06.24 13:43:37 BST
Reason: On behalf of the Department for Business Energy and Industrial Strategy
Location: The Department for Business Energy and Industrial Strategy

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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

BREAGH, Breagh Platform, DRILLING PRODUCER WELL 42/13a- 42/13a-SE planned well

DR/2125/0 (Version 3)

Whereas INEOS UK SNS LIMITED has made an application dated 16th June 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: 24th June 2021

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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 1 July 2021 until 31 December 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.

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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

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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. 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 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

Drilling of 36" section and 17.5" reservoir section using Water Based Mud (WBM)
Drilling of 12.25", 8.5", 6" sections using Low Toxicity Oil Based Mud (LTOBM).
Contingency drilling of a 6" geological sidetrack with LTOBM.
Well bore clean up and completion
Stimulation
Well clean up and well testing

Description of the Project

This project is the drilling of the 42/13a - SE (A11) production well from the Breagh

Alpha Platform using the Maersk Resolve Mobile Offshore Drilling Unit (MODU). It will be the 11th production well at the Breagh platform installation and is designed to be a long reach well to target the eastern side of the Breagh reservoir. Operations are expected to take 140 days. The well sections will be drilled with a combination of WBM and LTOBM with the WBM cuttings discharged to sea and the LTOBM cuttings shipped to shore for recycling/disposal. On completion of the drilling operations the well will be cleaned up and displaced to brine in preparation for the running of the completion and production. In order to achieve economic production rates, the well will then be stimulated by pumping a stimulation fluid into the formation. This will be achieved by perforating the 4.5" liner and cement through to the formation and a solid proppant will be added to keep the cracks in the formation open. Well clean up and testing of the well will then be conducted. This will involve a period of initial flaring of less than 48 hours wherever possible and then, following approximately 7 to 10 days of clean-up through either a donor well or the package, a well test may be undertaken, which would be no more than 24-48 hours. It is estimated that up to 20mmscfd (440 tonnes or 576,850m3 per day) may be flared during the initial clean-up followed by a 48 hour well test at up to 50mmscfd (1,100 tonnes or 1,442,125m3 per day).

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

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.

Other than the matters considered further below, 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 proposed drilling project is located in the Breagh field in the Southern North Sea, in UKCS Block 42/13a, approximately 62 kilometres (km) east from the UK coastline at Flamborough Head, and 178 km from the UK/Dutch Median Line, in a depth of approximately 62 metres (m).

The seabed at Breagh is relatively flat, deepening from the centre to the northeast of the survey site. The sediments around the site are comprised of fine sand, with areas to the west of exposed underlying chalk and areas of clay to the east. The survey at the platform location found fairly uniform sediment distribution, characterised by fine sand with gravelly patches. A seabed survey of the proposed location of the MODU confirmed the gradual slope towards the northeast and identified a series of spudcan depressions from previous campaigns

Surveys around the Breagh platform location demonstrated that overall, the faunal community was largely uniform, with low numbers of both taxa and individuals spread largely evenly across samples. The platform survey did not identify the presence of biogenic reefs or other sensitive habitats protected under the EC Habitats Directive.

No Annex I habitats or communities of conservation significance (including both methane-derived authigenic carbonates and potential stony reefs) were present within the survey area. The project is located 2.1 km from the Southern North Sea Special Area of Conservation (SAC) designated for harbour porpoises and 35 km from the Dogger Bank SAC designated for sandbanks. There are also a number of Marine Conservation Zones (MCZ) in the SNS. The nearest is 4km south of the Breagh pipeline, off the Yorkshire Coast. The project is located within the boundary of the North East Inshore and North East Offshore Marine Plan area.

The highest densities of minke whale and white beaked dolphin are found in July. Harbour porpoise may be present throughout the majority of the year with August and September potentially having high densities. Bottlenose dolphin may be present in low densities during July and August. Grey seals are also present in low numbers in the Breagh area.

Seabird sensitivity is very high within 42/13 in June, high in September, and low in July and August.

The proposed operations will coincide with fish spawning and/or nursery activity for a number of species. A herring spawning survey conducted around the Breagh location identified that the area is not suitable for spawning.

The project area is primarily used for demersal fishing with fishing activity at its lowest from January to March. The period of greatest fishing activity in the vicinity of the Breagh is in May/August, September and October.

The Hornsea Project One wind farm development is 53 km away and the Dogger Bank wind farm development 74 km away. The closest oil and gas installation is the Garrow Normally Unmanned Installation (NUI), which is 45 km away. Due to the proximity to the coast, there are likely to be a moderate number of recreational users during the summer months. The nearest wreck is located within the Breagh field with the next nearest 3.1 km to the north east and 6.8 km to the south west. Block 42/13 is within a Ministry of Defence (MoD) training ground. Shipping density in the area is moderate.

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.

The Maersk Resolve MODU will be located in the 500 m zone of the Breagh platform excluding unauthorised access of vessels and prohibiting access to fishing vessels. In addition, the MOD have no objections to the presence of the MODU and a survey in the area in which the MODU will be located identified no wreck debris in the vicinity. The presence of the MODU is therefore not considered to have a significant impact on other users of the sea.

There will be disturbance of the seabed of the benthic fauna as a result of rig anchor placement, spud cans and subsea works associated with the drilling of the well. Anchors will be used for positioning the MODU and will be removed once it is in place and the three legs are jacked down with each leg terminating in a spud can on the seabed. The potential impact of the MODU on the seabed will be minimised by placing each leg in the impressions left from MODUs used on previous projects. Once the MODU is removed, the area will then become available for rapid re colonisation of benthic organisms through movement and migration. It is not considered that there will be a significant long-term impact from the location of the MODU on site and therefore any impacts are not likely to be significant.

Atmospheric emissions will arise from the use of the MODU and associated vessels and from flaring during the well clean up and testing. Breagh is 62km from land (at the nearest point) and 45km from the nearest fixed installation (Garrow Platform). Any changes in air quality in the vicinity of the MODU will be localised and emissions will rapidly be dispersed and therefore are not likely to have a significant impact.

WBM cuttings will be discharged but it is considered these will disperse due to the strong water currents in the area and will have a limited impact. These are not likely to have any significant impacts on the environment. The LTOBM cuttings generated will be recovered to the MODU and shipped to shore There will be no overboard cuttings or mud discharges from the LTOBM sections.

Discharge of offshore chemicals associated with the drilling of the well, cementing and completion operations have been assessed as not likely to have a significant effect on the environment. Offshore chemicals associated with LTOBM will be returned to shore for treatment and disposal.

The wellbore clean-up operations may result in the discharge of wastewater containing residual base oil from the LTOBM. This discharge has been assessed and is not considered to have a likely significant effect on the environment.

There are no expected transboundary effects from the drilling operations at the Beryl

Alpha. The nearest boundary (UK/Norway Median Line) is located approximately 178 km of the operations. It is not considered likely that any planned operational discharge (chemicals) will be detectable at this distance from the well location.

Although not a planned activity, a worst-case major accident scenario resulting from a potential well blow-out (release of condensate and gas) was modelled and assessed. The likelihood of a major release of hydrocarbons occurring during the proposed drilling operations is considered to be extremely low. Therefore, it is considered that the control measures in place to prevent loss of well control minimise the risk of an oil spill which could have a significant impact and the proposed operations carried out as planned are not likely to have a significant effect on the environment.

The drilling operations are in accordance with the North East Inshore and North East Offshore Marine Plan area objectives and policies. It is considered that the drilling of the Breagh well is not likely to have a significant impact on other offshore activities or other users of the sea 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:

N/A