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Offshore Petroleum Regulator
for Environment & Decommissioning

TOTALENERGIES E&P UK LIMITED
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Registered No.: 00811900

Date: 28th July 2021

Department for Business, Energy
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Dear Sir / Madam

**THE OFFSHORE OIL AND GAS EXPLORATION, PRODUCTION, UNLOADING
AND STORAGE (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS
2020
ELGIN 22/30c-B5 (EIG) DEVELOPMENT WELL - WELLBORE CLEAN UP AND
COMPLETION**

A screening direction for the project detailed in your application, reference DR/2133/0 (Version 3), dated 22nd 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



**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**

**ELGIN 22/30c-B5 (EIG) DEVELOPMENT WELL - WELLBORE CLEAN UP AND
COMPLETION**

DR/2133/0 (Version 3)

Whereas TOTALENERGIES E&P UK LIMITED has made an application dated 22nd 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: 28th July 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 28 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.



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:

DR/2133/0 (Version 3)

The Department has the following comments to be addressed at the variation stage:

1. Condensate worst-case flow rate:

The figure in the MAT must be checked against that in the EAJ to ensure both align.

2. Contaminated sediments:

Section 5.2.2 of the EAJ describes how the area includes contaminated sediments from historic activity. Any potential impacts of re-suspended contaminated sediments should also be considered (in any future applications in this area).

3. Designated features of MPAs within 40km of operations:

JNCC have highlighted that the MAT (Environmental Considerations) does not list Subtidal sand as a designated feature of Fulmar MCZ, which should be included.

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

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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, 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 Assessment 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

Wellbore Clean-up and Completion of the Elgin EIG Well.

Description of the Project

The wellbore clean-up and completion of the Elgin EIG well will be undertaken from a mobile offshore drilling unit (MODU) and are expected to take 35 days to complete between July and December of 2021. The MODU is currently on location at the Elgin WHP (wellhead platform) and is maintained in position by four anchors and aided by support vessels. The drilling of the well was the subject of a direction given previously (reference DR/2005/0) and has already been undertaken. The wellbore clean-up and completion will consist of cleaning the wellbore of drilling mud and displacing this to seawater and then freshwater, which will involve chemical use and discharge. No associated flaring is required. Pollution and nuisances are restricted to use of combustion equipment and chemicals.



The thin layer of deposition from drilling of the well has the potential to overlap with the footprint from other wells in the Elgin field; however, the wellbore clean-up and completion is not expected to result in any cumulative impacts. No cumulative impacts are expected to occur with any other existing or approved projects. The next nearest oil and gas installation is 5 kilometres (km) from the site.

The risk of major accidents was assessed and the Developer has control measures in place to reduce the risk of a major accident occurring.

The project is not at risk from natural disasters and there is not considered to be any significant risk to 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 is located 223 km east from Aberdeen and 33 km west of the UK/Norwegian median line, in an area of the Central North Sea (CNS) where the seabed comprises fine sands and clay with patches of gravel and the water depth is approximately 93 metres (m). The surface current speed in the area is approximately 0.14 m/s and the wave height ranges from 2.1 - 2.4 m, which is typical of this northern area of the CNS. Site-specific surveys identified the seabed as predominantly flat and sandy with occasional coarser patches. The seabed in the surrounding area contains evidence of previous oil and gas or other industries' activity with cuttings piles, spud can depressions and anchor scars visible. The sediments in the area also indicate historic activity by elevated hydrocarbon and metal concentrations across the site. This is typical of the wider area which has been heavily developed for oil and gas. The faunal composition identified by the site surveys was typical for areas of organic enrichment from hydrocarbons and included high numbers of highly tolerant species. Ocean quahog individuals were identified during sampling carried out in the area in 2012 and 2013.

The project is not located in any protected areas. The closest protected area is the East of Gannet and Montrose Fields 14 km to the west. The project is located in an area of considerable oil and gas development. There are no wrecks or telecommunication cables in the area and the project is not located within an area of military activity.

The project will take place during spawning seasons for mackerel, lemon sole, sandeel and Nephrops and within the nursery area of several fish species.

Several cetacean species have been recorded during the period for which the project works are planned. Seabird abundance is low for the period when project works are planned. The area is described as a low intensity fishing area and fishing effort is predominantly focussed on demersal and shellfish species.

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 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.

Potential impacts to the environment from the wellbore clean-up and completion activities associated with the project were assessed, including impacts arising from atmospheric emissions, seabed disturbance, physical presence, planned discharges and accidental spills.

Power generation on board the MODU and support vessels will generate atmospheric emissions which are expected to result in a short-term deterioration in air quality in the immediate area. This localised effect is expected to be temporary given the meteorological conditions at the offshore location. The wellbore clean-up and completion are expected to take 35 days which represents a contribution of <0.01% to the total mass of CO₂ generated from UK offshore activities in 2019. The impacts arising from atmospheric emissions are not considered to be significant.

Seabed disturbance from the MODU anchors is estimated to impact an area of 139 m². This may result in displacement or mortality of sedentary organisms along with resuspension of sediment. These potential impacts are restricted to a small area and, combined with the dynamic nature of the marine environment and the resilience of the local fauna, are not expected to have a significant effect. Benthic communities are expected to recolonise the area after the MODU has departed. The potential impacts will not extend to any protected sites and are not expected to affect protected species at the population level.

The MODU is currently located alongside the Elgin WHP which has an existing 500 m radius safety zone, excluding the unauthorised access of vessels. This prohibits access to fishing and shipping vessels, although the wider area is described as a low intensity fishing area and therefore the physical presence of the MODU is not considered likely to have a significant impact.

Discharge of chemicals associated with the wellbore clean-up and completion activities have been assessed and found not to have a significant impact on the environment. The high energy marine environment is expected to result in rapid dispersion of chemical discharges. Seawater contaminated with drilling mud from the wellbore clean-up operations will be captured and sent onshore for treatment and disposal.

A worst-case major accident scenario resulting from a potential well blow-out was



modelled and assessed. The low viscosity of the hydrocarbons (gas and condensate) mean that any accidental spill would be likely to rapidly disperse and evaporate, therefore they would not persist in the marine environment. The modelling indicates that there is no probability of hydrocarbons reaching any coastline. The potential environmental impacts resulting from a worst-case event are not considered likely to be significant. The Developer has measures in place to prevent and respond to an accidental event.

There are no expected transboundary impacts as a result of the project and no cumulative impacts have been identified given the other known 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:

n/a