

Our Ref: 01.01.01.01-4740U
UKOP Doc Ref:1160250



Offshore Petroleum Regulator
for Environment & Decommissioning

REPSOL SINOPEC RESOURCES UK LIMITED
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LONDON
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Registered No.: 00825828

Date: 17th September 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
PIPER B PRODUCER WELL 15/17-B1Z**

I refer to your amended application dated 14th September 2021, reference DR/2144/1 (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.

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**

PIPER B PRODUCER WELL 15/17-B1Z

DR/2144/1 (Version 1)

Whereas REPSOL SINOPEC RESOURCES UK LIMITED has made an application dated 14th September 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: 17th September 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 25 July 2021 until 31 March 2022.

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:

DR/2144/0 (V1) - 23 July 21

1. Whilst it is recognised that within this application the environmental impact is minimal, and that more recent non site-specific survey data was presented in this application, in future applications the any gaps or limitations in environmental information should be acknowledged with, where appropriate, strategies to address these gaps or limitations and justification as to why up to date baseline information has not been included. The site-specific environmental data provided in this application is 17 years old. Since these surveys were undertaken, there is potential for the local environment to change. In addition, it is important to ascertain baseline data from which to measure the impacts of operations when it comes to the decommissioning of facilities at the Piper field.

2. The assessment demonstrates the possibility of surface oiling on the Scottish coastline, if an accidental event were to occur. It is advised that impacts on aquaculture and Shellfish Water Protected Areas are considered.

3. Marine Scotland Science would like to request a copy of the following survey(s) / report (s) cited in this submission for our archive. Please note that survey reports held by Marine Scotland may be made publicly available and published on the Marine Scotland website:

Aberdeen University Marine Studies (AUMS) Ltd (1990). *Environmental Seabed Survey of the Benthic Sediments around the Tartan Field*. Prepared for Texaco North Sea UK Co. by G J Cranmer, Aberdeen University Marine Studies Ltd, Dept. of Zoology.

Fugro (2004). *Tweedsmuir pipeline route survey. Environmental Report*. Volume 3. Job Number: 68-7995

Talisman (2004). *Environmental Statement for The Tweedsmuir Development April*



2004 . UKBENTHOS (2000) UKOOA. 1990 Piper B survey.

APEM (2020). *Tartan, Highlander, Petronella, Duart & Galley; Pre-Decommissioning Surveys; Tartan TTN Sample Analysis Report*. APEM Scientific Report P00004267, Repsol Sinopec Resources UK Limited 05/03/2020; v 2.1; and Habitat Assessment Report APEM Scientific Report P00004276. Repsol Sinopec Resources UK Limited, 17/02/2020, v3.2.

4. The following paper (Jos M. Gonzalez-Irusta, Peter J. Wright; Spawning grounds of Atlantic cod (*Gadus morhua*) in the North Sea, ICES Journal of Marine Science, Volume 73, Issue 2, 1 February 2016, Pages 304-315, <https://doi.org/10.1093/icesjms/fsv180>) provides an update to the cod spawning areas and describes this area as an 'unfavourable' cod spawning area.

5. Please note that whiting are also detailed in the list of PMF species.

6. Figure 3.2 is beneficial but it would also be beneficial if other maps are also included for value, tonnage and effort for the demersal and shellfish groups from the same source. The quality of the figure also makes the information difficult to interpret.

7. For future applications, the expected thickness and spatial extent of the cuttings deposited should be described.

8. With reference to Section 4.4.2. (Cement residues) the application should detail the worst case volume of cement to be discharged in association with the proposed cement trial.

9. Scottish National Marine Plan - it is advised that consideration of general policies 1 (General planning principle), 4 (Co-existence), 5 (Climate change), 14 (Air quality) and 21 (Cumulative impacts) should also be included. In addition, with respect to Oil and Gas Chapter 9; Policy 1) - it is advised that the section confirms that the operation is aligned with the principles of Best Available Technology (BAT) and Best Environmental Practice (BEP).

10. Section 5.2.3 (Piper B Safety Case MEI Assessment) - Table 5.4 - were the recently designated Seas off Foula SPA and Southern Trench NCMPS also considered?

11. It is noted that impacts associated with emissions have not been captured in this application.

12. Repsol Sinopec North Sea Limited should note that Marine Scotland Science has added new spatial layers to the Marine Scotland MAPS National Marine Plan interactive (NMPi) showing predicted seabed habitats (<https://marine.gov.scot/maps/68>)

and sediment types (<http://marine.gov.scot/maps/745>), which are advised, to provide additional regional context. These spatial layers may be viewed on the Marine



Scotland MAPS National Marine Plan interactive (NMPi) web site :
<https://marinescotland.atkinsgeospatial.com/nmpi/>.

The Marine Scotland MAPS National Marine Plan interactive (NMPi) now contains useful layers showing the known locations of species and habitats of conservation importance. MSS advise this is represented visually. More details may be obtained from the 'healthy and biologically diverse' sections at the following web address:
<http://marine.gov.scot/themes/healthy-and-biologically-diverse>

and on NMPi here: <https://marinescotland.atkinsgeospatial.com/nmpi/>.

The Inner Hebrides and Minches Special Area of Conservation (SAC) was designated in 2018 for Harbour porpoise which would benefit from being highlighted.

New aggregated VMS fishing effort data sets for 2009 - 2016 are now available on the National Marine Plan Maps interactive web site (NMPi). The data are split into three groups of fishing method: bottom trawls, dredges and crustaceans caught by bottom trawl (i.e. Nephrops). The Nephrops and crustaceans layer is a subset of the dredges layer but also includes data for 2017. Further information may be obtained here <http://marine.gov.scot/node/12832>. Map layers showing average annual fishing effort (mW fishing hours) in the Greater North Sea Ecoregion during 2015-2018 are also available via EMODNET. Data are split by gear type: beam trawls, bottom otter trawls, bottom seines, dredges, pelagic trawls and seines and static gears. Further information is available here: <https://www.emodnet-humanactivities.eu/view-data.php>.

The EMODNET Human Activities data portal now contains useful up to date shipping information based on the Automatic Identification System (AIS). Further information is available here: <https://www.emodnet-humanactivities.eu/view-data.php>

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
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Crimon Place
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AB10 1BJ

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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:

The information provided by the developer.

The matters listed in Schedule 5 of The Offshore Oil and Gas Exploration, Production, Unloading and Storage (Environmental Impact Regulations 2020) (the Regulations).

The results of any developer assessments of the effects on the environment of the project; and

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 project

B01z abandonment

Slot recovery at the 95/8" casing using Water Based Mud (WBM)

Drilling of an 81/2" side-track section using Water Based Mud (WBM)

Wellbore clean-up

Completion and installation of Xmas Tree

Description of project

Development Well 15/17-G will be drilled as a side-track from existing well 15/17-B01z (Slot 17) from the Piper platform with operations expected to last 66 days. The well will be completed as an infill development (Producer) well to support production in the Piper area. All sections will be drilled using water-based mud (WBM). Water based mud will be treated and passed over shakers before being discharged to sea. Once all slot recovery, drilling, cementing and clean-up operations



have been conducted an Xmas Tree will be installed on the well. The well will then be handed over to production prior to bringing the well online through production facilities on the Piper Bravo Platform.

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 Piper field is located in Block 15/17 in the central North Sea approximately 155 km east of the Scottish mainland and approximately 72 km west of the UK/Norwegian median line in a water depth of approximately 146 m. The project is in an area characterised by mud and sandy mud. The wave height within the Piper Platform area ranges from 2.31-2.32 m. Tartan TTN surveys indicate that sediments in the area consist predominantly of deep circalittoral mud. Surveys undertaken for the Piper, Saltire and Tartan fields indicated that benthic fauna are typical of silty-sand soft sediments characterised by identified taxa including sea pens, anenomes and crustaceans including Nephrops and hermit crabs. No evidence of sub tidal reefs, submarine structures or any potential Annex I Habitats have been found in the vicinity of the Piper platform. Numerous pockmarks have been recorded in the area, which can indicate the presence of the Annex I, however, none of these display any evidence of species aggregation and are not considered to be areas of significant biological activity. There are no marine protected areas within 40 km from the Piper platform and therefore it is unlikely that the project will have any effect on protected sites.

Fish spawning and nursery activity will occur in the area, which may coincide with the drilling operations. Minke whale, killer whale, common dolphin, white-beaked dolphin harbour porpoise and Atlantic white-sided dolphin and Risso's dolphin have been recorded in the vicinity of the Piper platform. Densities of these species range from high to low throughout the year. Seals are not expected to be seen at the remote location. Seabird vulnerability in Block 15/17 is predominantly low all year round. The project area is primarily used for demersal fishing and the effort in the area is rated low to moderate.

The Piper field is in an area of major oil and gas developments and infrastructure and



there are several oil and gas fields nearby. There are no operational renewable energy sites or any under construction in the vicinity of Block 15/17. No known wrecks of historical importance or military activity within the vicinity of the proposed operations. Shipping density in the area is low.

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 Piper Platform excluding unauthorised access of vessels and prohibiting access to fishing vessels. The drilling project is a side-track from an existing well and as such there are no cuttings from the re-entry section. All cuttings will be treated and passed over shakers before being discharged to sea and therefore impacts to the seabed impacts will be minimal.

Discharge of offshore chemicals associated with the re-entry of the well, cementing and completion operations have been assessed as not likely to have a significant effect on the environment. The wellbore clean-up operations may result in the discharge of wastewater containing residual base oil, 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 Piper Platform. The nearest boundary (UK/Norwegian median) is located approximately 72 west 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 was modelled and assessed. Although the consequences of an oil spill can be severe, the probability of a large oil spill from the proposed operations is 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 emissions associated with the project result from power demand for the proposed operations. Drilling facilities are integrated on the platform and use the electricity generated by the offshore combustion installations. It is expected the



emissions will be rapidly dispersed and are not likely to have a significant impact.

Drilling operations will be conducted from the existing Piper Platform and therefore there is no increase in the infrastructure footprint. No cumulative impacts are expected to occur. The Piper field has been developed for several years and the locations of the platform are well known to other marine users and marked on the appropriate navigational charts. It is considered that the drilling of the well from the platform is not likely to have a significant impact on other offshore oil and gas activities or other users of the sea.

There is no aggregate extraction, dredging, or dumping activity. There are no planned, consented or operational wind farms within Block 15/17. Additionally, both fishing activity and shipping activity within Block 15/17 is considered relatively low. There are no charted wrecks located in the vicinity of the proposed development well location. The project is in the vicinity of other oil and gas developments, but there are no expected cumulative impacts with other oil and gas activities. Cumulative impacts have been assessed as not likely to have a significant effect on the environment.

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:

There are no mitigation of significant effects required.