

Our Ref: 01.01.01.01-3930U
UKOP Doc Ref:1162431



Offshore Petroleum Regulator
for Environment & Decommissioning

NEO ENERGY PRODUCTION UK LIMITED
30 ST. MARY AXE
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Registered No.: 12086835

Date: 29th September 2021

Department for Business, Energy
& Industrial Strategy

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Aberdeen
AB10 1BJ

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bst@beis.gov.uk

Dear Sir / Madam

**THE OFFSHORE OIL AND GAS EXPLORATION, PRODUCTION, UNLOADING
AND STORAGE (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS
2020
DONAN**

A screening direction for the project detailed in your application, reference PR/2186/0 (Version 1), dated 6th September 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**

DONAN

PR/2186/0 (Version 1)

Whereas NEO ENERGY PRODUCTION UK LIMITED has made an application dated 6th 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 (54-21).

Effective Date: 29th 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

This screening direction shall be valid from 4 October 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.

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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 permit variation:

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 [REDACTED]



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 oil and gas at the Donan field for the year 2022 (OGA Reference 54-21).

Description of the Project

Production of oil and gas will increase from the Donan field as a result of the reconnection of the P8 well to the Drill Centre (DCC) manifold. No alteration in the quantities of processing chemicals is anticipated at the Global Producer III installation where processing of Donan field takes place.

No cumulative impacts are expected to occur with any other existing or approved projects. There is no change to the assessment of a major accident. 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.

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 Donan field is located in Block 15/20 in the Central North Sea (CNS) approximately 180 km east from the Scottish coastline and 40 km west of the UK / Norwegian median line, The field is tied back to the Global Producer III (GP3) Floating Production Storage and Offload (FPSO) vessel, in an area where water depth is approximately 140 m. The predominant current in the location originates from Atlantic inflow from the west, resulting in a residual water movement to the south or east.

The project is located 9 km from the Scanner Pockmark Special Area of Conservation (SAC) (designated due to the presence of submarine structures made by leaking gases). There are no known specified Annex I habitats, however there are areas of gas seepage and associated pockmark features in the vicinity, although investigations indicated that all the pockmarks studied in the Donan and Lochranza areas are inactive. Surveys have indicated that sediments in the area are comprised of medium to coarse silts. Epifauna was generally dominated by annelids and molluscs

The Donan field is located in International Council for the Exploration of the Sea (ICES) rectangle 45F0 fishing effort is predominantly focussed on pelagic species. Fish spawning and nursery activity will occur in the area which will coincide with operations.

Atlantic white-sided dolphin, harbour porpoise, killer whale, minke whale and white beaked-dolphin have been recorded in the vicinity of the Donan field, however all sightings of species have been in low numbers. Seals may be encountered infrequently due to the remote location. Seabird sensitivity is described as low or medium throughout the year.

There is a number 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. Shipping density in the area is moderate.

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 2022 are within the capacity of the existing production facilities. P8 fluids may require the use of a hydrate inhibitor, this is not considered to pose a significant risk to the receiving environment, no changes to the produced water forecast is expected as a result of the production increase.

Although there is an increase in gas production GP3 is gas deficient and produced gas is used as fuel gas. The base flare, is approximately constant and is not significantly influenced by changes in production consent. The total gas production and flaring levels from GP3 in 2022 are less those attained during peak production. As venting is directly related to the oil production rate a small increase in venting is expected in 2022 as a result of the increase in production, however, this remains within the limits requested in the annual vent consent. Atmospheric emissions from the change in production will therefore not have a significant impact on the environment.

The existing accidental event spill modelling is applicable and 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.