Our Ref: 01.01.01.01-4835U
UKOP Doc Ref:1173233

Offshore Petroleum Regulator
for Environment & Decommissioning

ITHACA ENERGY (UK) LIMITED
13 QUEEN'S ROAD
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Registered No.: SC272009

Date: 23rd November 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
CAPTAIN, Captain WPP'A', DRILLING PRODUCER WELL 13/22a-C67Z W01A

A screening direction for the project detailed in your application, reference DR/2166/0 (Version 3), dated 15th November 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: 2021.11.23 09:48:22 GMT
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

CAPTAIN, Captain WPP'A', DRILLING PRODUCER WELL 13/22a-C67Z W01A

DR/2166/0 (Version 3)

Whereas ITHACA ENERGY (UK) LIMITED has made an application dated 15th November 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 WONS/13057/0/GS/1.

Effective Date: 23rd November 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 28 December 2021 until 30 June 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:

The Department has the following comment:

DR/2166/0 (V3) - 23 November 2021.

1. As this is the first application in a campaign of drilling wells from the Captain WPP 'A' Platform, the Department requests that for the next screening direction application, modelling is undertaken for the cuttings piles for all the wells in said campaign. Please discuss this with the Department prior to the submission of the next screening direction application.

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

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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 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:

- recovery of the C67z slot back to the 13 3/8" shoe

- redrill the well to access the reserves in the Upper Captain sand

- contingency sidetrack for the new well have been included to represent the worst case (for cuttings assessment).

Description of the Project

The development well (W01A) will be drilled from the Captain WPP 'A' platform, with

operations expected to last 61 days. The C67z well will be bullheaded and killed with bridge plugs set to allow new drilling to be undertaken. Drilling of a 12 " section will be undertaken, followed by an 8 " section, both of which will be drilled with Water Based Mud (WBM), which will be discharged to sea along with the drill cuttings. Contingency sidetracks have been included for both sections, to allow for the worst case drilling scenario to be assessed. The well, which will be drilled within the installations' 500m safety zone, is within a well-developed area of the Central North Sea and cumulative impacts from drilling discharges, atmospheric release and oil and chemical releases have been assessed.

It has been concluded that there will be no cumulative impacts expected to occur from this project due to the selection of low bioaccumulation water-based muds, the proposed mitigation and the short duration of the project.

It is not considered to be likely that the project will be affected by natural disasters and 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 Captain WPP 'A' platform is located in the outer Moray Forth, approximately 191 km from the UK/Norwegian median line and 69 km from the Scottish mainland. The seabed within the area of the platform is represented by soft sediment with the main sediment type observed as sandy, mud/muddy sand, which is classified as 'deep circalittoral mud'.

Mean water depth is approximately 89.2 m in the west of the survey area to around 124m in the east of the area. The wave height within the area ranges from 1.81 - 2.1m. Sediment samples taken during a survey indicate that sediments were either classed as mud and sandy mud. Numerous seabed scars were observed which were interpreted to be trawler scars, and the result of relic anchoring activities. There was no evidence of leaking gases or submarine structures made by leaking gases during any survey of the Captain field.

A recent seabed survey of the area showed that the epibenthic fauna was sparse. The dominant epifauna observed were sea pens. Others observed were Norway Lobster, starfish, bristle stars and polychaetes. Faunal tracks and burrows were observed within all sample stations. The most recent survey recorded sea pens at every station with the abundance recorded as 'occasional' and 'frequent'. Faunal burrows and burrows created by the Norway Lobster also ranged from 'common' to

'abundant' using the SCAFOR scale. Priority Marine Features (PMF) such as offshore circalittoral sandy mud habitat, and burrowed mud and offshore deep muds are known to exist within the Captain area, as well as the OSPAR listed habitat of seapens and burrowing megafauna communities and the ocean quahog.

Minke whale, long finned pilot whale, killer whale, bottle nosed dolphin, white-beaked dolphin, Atlantic white-sided dolphin and harbour porpoise have all been recorded in the vicinity of the Captain area. Densities of the species are categorised as low to moderate, with the exception of the white-beaked dolphin which is of a high density in August and December. Due to the location of the Captain field from shore, grey and harbour seals may be encountered but it is likely that these sightings are in low numbers.

Seabird oil sensitivity in the vicinity of the Captain field is low to extremely high throughout the year.

The Captain platform is not situated within any conservation areas, with the nearest area of conservation interest being the Southern Trench (NC MPA) which lies 47km to the west. This site is protected due to a variety of biodiversity and geological features including burrowed mud, sub-glacial tunnels and minke whale. The Moray Firth SAC is located 108km to the east of the installation and is designated such due to the presence of sandbanks and a resident population of dolphins.

The Captain field lies within fishing designated ICES rectangle 45E8, however the drilling of well W01A does not extend outwith the 500m safety zone of Captain WPP 'A', where fishing vessels are already excluded. The proposed operations will coincide with fish spawning and/or nursery activity for a number of species. The proposed project is primarily used for pelagic fishing and the fishing effort in the area is rated as low (fishing in the remaining area accounts for only 1% of both UK landings and value). It is not anticipated that the drilling of well W01A will have a significant impact on the fishing industry in the area.

There are five wrecks within the Captain area, with 2 located within the Captain field. None are wrecks designated under the Protection of Military Remains. There are no wind farms close to the area, with the closest being the Moray East, which is located 54km south-west of the platform. The closest Carbon Capture and Storage (CCS) site (Acron) is located 4km to the east of the platform. The nearest Sectoral Marine plan for offshore wind is NE6, approx. 8km south of the platform and there are no telecommunication cables within 40km of the Captain field. It is not anticipated that the operations at Captain will have a significant impact on either the wrecks, cables or windfarms.

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 in place a 500 m radius safety zone around the Captain WPP 'A' platform, which excludes unauthorised access of vessels and prohibits access to fishing vessels. No additional impacts to other marine users are identified as part of the drilling of well W01A.

Cuttings from the WBM sections will be discharged at the seabed and into the water column. Data gathered from studies in the area show that the cuttings are predicted to disperse from the area around the wellhead naturally over time.

Seabed disturbance from the discharge of WBM drill cuttings could result in the smothering and mortality of benthic fauna which will result in some short-term temporary impacts. Ocean Quahog are sensitive to increased siltation above 30cm, but it is concluded that as the WBM will be discharged to the water column, no cuttings pile greater than 30cm is expected. The sea pen and burrowed mud habitats are also likely to be more sensitive to smothering above 30cm, however the cuttings pile of this height is not expected. Burrowed mud habitats are also used by the Norway Lobster, however it has been shown that they are tolerant to smothering and suspended sediment. Cuttings and associated muds will be deposited as a thin layer over the seabed (approx. 200-250m from the well) and it is concluded that the burrowed mud habitat is expected to have a high resilience to the temporary disturbance (increased siltation). Given the small area of impact and the discharge of the WBM to the water column, it is expected that the benthic communities will regenerate in the area over time.

Any noise will not be significant, and it is concluded that activity is not expected to have a likely significant effect on the site in relation to harbour porpoise and the supporting habitats and prey.

There are no expected transboundary effects from the proposal to drill W01A well. The nearest boundary (UK/Norwegian median) is located approximately 191 km from the proposed well location. It is not considered likely that any planned operational discharge (cuttings and chemicals) will be detectable at this distance from the Captain platform.

A worst-case major accident scenario resulting from a potential well blow-out was modelled and assessed and the probability of a large oil spill from the proposed drilling is low. The Developer has a number of mitigation and control measures in place to reduce the risk of a major accident occurring and the probability of such an event occurring (including the worst-case scenario identified above) is very low.

Therefore, the risk of an oil spill event that could have a significant impact on the environment is minimised.

The proposed drilling operation will utilise the existing Captain WPP 'A' power generation equipment. Atmospheric emissions are permitted by a PPC (Pollution Prevention and Control) Permit, and are regulated separately.

2) 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.

3) 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