

Our Ref: 01.01.01.01-4901U  
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Offshore Petroleum Regulator  
for Environment & Decommissioning

PETROGAS NORTH SEA LIMITED  
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LONDON  
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Registered No.: 05470844

Date: 28th March 2022

Department for Business, Energy  
& Industrial Strategy

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[bst@beis.gov.uk](mailto:bst@beis.gov.uk)

Dear Sir / Madam

**THE OFFSHORE OIL AND GAS EXPLORATION, PRODUCTION, UNLOADING  
AND STORAGE (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS  
2020  
22/19a- Birgitta East well**

I refer to your amended application dated 28th March 2022, reference DR/2202/1 (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](mailto: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**

**22/19a- Birgitta East well**

**DR/2202/1 (Version 1)**

Whereas PETROGAS NORTH SEA LIMITED has made an application dated 28th March 2022, 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/12310/1 IDA.

Effective Date: 28th March 2022



## **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 15 December 2021 until 30 April 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](mailto: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:

### For Future Applications

MSS has recently added new spatial layers to the Marine Scotland MAPS National Marine Plan interactive (NMPi) showing predicted seabed habitats and sediment types, 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://www2.gov.scot/Topics/marine/seamanagement/nmpihome>

The Marine Scotland MAPS National Marine Plan interactive (NMPi) now contains useful layers showing the known locations of species and habitats of conservation importance. 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/>.

Finalised Scottish Government fisheries statistics for 2020 were published in October 2021. These are now available through the Marine Scotland Data page: <https://data.marine.gov.scot/group/fisheries>. Operators are advised to refer to the combined Excel spreadsheets which include statistics for 2016 - 2020. These are available on the following web page (doi: 10.7489/12378-1) <https://data.marine.gov.scot/dataset/2020-scottish-sea-fisheries-statistics-fishing-effort-and-quantity>

MSS advise that references to the work by 'Kafas et al, 2012' are now replaced with a visual representation of the 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>.

In addition, MSS advise visual representation of the recently added nine new spatial layers to the National Marine Plan interactive (NMPi) showing changes over the last five years of published statistics for:

1. tonnage for demersal, pelagic and shellfish species;
2. value (£) for demersal, pelagic and shellfish species;
3. effort (days) (by UK vessels >10m length) for demersal active (bottom trawls, dredges etc.); pelagic active (pelagic trawls, purse seines etc.); and passive (pots/creels, gillnets etc.).

Further details are available here: <http://marine.gov.scot/node/12674>

The 2009 - 2016 VMS fishing effort data set and the statistics map layers (1, 2 and 3 above) may be viewed on the NMPi web site: <https://marinescotland.atkinsgeospatial.com/nmpi/>.

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](mailto: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

This post screening direction amendment (DR/2022/1) relates to a change to a project for which a screening direction was previously issued by virtue of a change in well section as detailed below.

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

- Drilling the Birgitta East appraisal well, under WONS/12310/1 IDA.

### Description of the Project

The application has been varied to account for a change in well section from 8 1/2 inches to 5 7/8 inches due to losses in the Tor formation during drilling.

The drilling of the Birgitta East appraisal well will be undertaken from the Maersk Resilient jack up Mobile Offshore Drilling Unit (Modu) and will take a maximum of 70





days and is expected to commence after 15 December 2021 and be completed by 30 April 2022.

The condensate and gas well will consist of 5 sections (36", 16", 16", 12 " and 5 7/8") drilled using water based mud (36" and 26") with cuttings discharged at the drill site, the remaining sections will be drilled using low toxicity oil based mud and cuttings from these section will be skipped and shipped to shore for treatment and disposal. Once drilling operations have been completed the well will be suspended for future re-entry. No well testing or flaring operations are planned and no reservoir hydrocarbon will be flowed to the surface.

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 hazard, for example, a well blow out, 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 Birgitta East well is located in UKCS Block 22/19a in the central North Sea, approximately 200 kilometres (km) east of the nearest UK landfall, at Peterhead on the north east coast of Scotland and 32 km to the west of the UK/Norwegian transboundary line.

The water depth at the Birgitta East well location is approximately 90 metres. The residual surface current in the vicinity of the Birgitta East well tends to be in a northerly direction, annual mean significant wave height in this area of the central North Sea is approximately 2.25 m. The Birgitta East area is predominantly comprised of muddy sand.

The main biotypes in the area are Deep circalittoral sand coarse sediment and Deep circalittoral mixed sediments. Benthic epifauna recorded across the Birgitta survey area was sparse but included faunal turf, anemones, king crab, polychaetes and Seapens which are listed as an OSPAR threatened or declining species. Ocean quahog shells were also identified in the sediment surface in the Birgitta survey area although no further evidence was identified in the survey.

The only marine protected area in the vicinity of the Birgitta East well location is the East of Gannet and Montrose Fields Nature Conservation Marine Protected Area (NC MPA) which is designated for the presence of ocean quahog and the presence of offshore deep sea mud which is a priority marine feature (PMF).



The Birgitta East well is located in International Council for the Exploration of the Sea (ICES) rectangle 43F1 where fishing effort is low and predominantly focussed on demersal species, with the majority of effort is from trawling activity. Fish spawning and nursery activity will occur in the area which will coincide with drilling operations.

Harbour porpoise, minke whale, white beaked dolphin and white-sided dolphin have been sighted in the area albeit in low numbers. None of the species have been sighted in ICES Rectangle 43F1 during the proposed window of operations. Seals may be encountered infrequently due to the remote location. Seabird sensitivity is low during the period of operations.

There is a number of other oil and gas infrastructure in the surrounding area. The project location is not within a military practice area and danger area. There are no licenced aggregate extraction locations, or any renewable energy infrastructure projects in the vicinity. 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, noise, seabed disturbance, physical presence, planned discharges and accidental spills.

Atmospheric emissions will arise from fuel used for power generation on the Maersk Resilient Modu, associated support vessels and helicopters. The discharge of emissions to atmosphere will not have a detrimental effect to local air quality over the long-term, nor will it inhibit the ability to reach wider climate change goals. The environmental effects from emissions to air are not expected to have a significant impact on the environment.

Noise generated from the drilling rig and support vessels would not result in injury or significant disturbance to fish or marine mammals and the impacts are considered to be not significant.

Seabed disturbance from the jack up spud cans and the deposition of WBM drill cuttings will cause disturbance over small area which will be short term in duration and recovery of the seabed will start immediately following the cessation of drilling operations, therefore these impacts considered not significant.

The drilling operation has the potential to cause interference to other users of the sea, however the rig and support vessels will be located in an extant safety zone for the well. Therefore, no additional impact is foreseen, and any impact from physical presence of the rig is deemed not significant. Support vessels will be on site continually to monitor for vessel traffic and provide alerts.



The discharge of chemicals associated with WBM, drill cuttings and cement to sea has been assessed as having no likely significant direct or indirect long-term effect. The use and discharge of the chemicals have been risk assessed and modelled in accordance with other regulatory requirements and is not expected to have a significant impact on the environment.

Consideration has been given to the potential effects of an accidental spill and a worst-case major accident scenario resulting from a potential well blow-out was assessed. The Developer has control measures in place to reduce the risk of a major accident occurring, including an emergency response plan. Given the condensate type, offshore location, high rates of evaporation and low likelihood of such an event no significant impact is likely to occur from such an event.

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