Our Ref: 01.01.01.01-5223U
UKOP Doc Ref:1221821

Offshore Petroleum Regulator
for Environment & Decommissioning

TOTALENERGIES E&P NORTH SEA UK LIMITED
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Registered No.: 03682299

Date: 23rd August 2022

Department for Business, Energy
& Industrial Strategy

AB1 Building
Crimon Place
Aberdeen
AB10 1BJ

Tel [redacted]
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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
Isabella Appraisal Well 30-12d, Noble Sam Hartley

A screening direction for the project detailed in your application, reference DR/2272/0 (Version 3), dated 10th August 2022 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: 2022.08.23 13:59:31 BST
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

Isabella Appraisal Well 30-12d, Noble Sam Hartley

DR/2272/0 (Version 3)

Whereas TOTALENERGIES E&P NORTH SEA UK LIMITED has made an application dated 10th August 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 agreement to the Oil and Gas Authority to the grant of consent for the project as detailed in the application, WONS/14438/0/IDA/1 Version 2.

Effective Date: 23rd August 2022

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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 23 August 2022 until 31 August 2023.

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 no comments

3) All communications relating to the screening direction should be addressed to:

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]

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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 as follows:

1) 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:

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 developer 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 project

i) Drill, log and in the success case, test the well.

ii) The well will be drilled in five sections: 36", 26", 171/2", 121/4" and 81/2".

iii) Following drilling each well section a casing / liner will be cemented into place.

iv) The 36" section will be drilled with seawater sweeps.

v) The 26" section will be drilled using water-based mud (WBM).

vi) The remaining sections will be drilled with oil-based mud (OBM).

vii) If a dry hole scenario is observed the well will be plugged and abandoned.

viii) If the well is successful a 7" liner will be run and a well test performed.

ix) A wellbore clean-up operation will be carried out.

Description of project

The 30/12d Isabella Appraisal Well will be drilled from the Noble Sam Hartley rig with operations expected to last 165 days in the case of a dry hole and 266 days in a success case. In the event the well meets success criteria a well test will be performed and if successful the well may be side-tracked. In both success and failure cases the well will be permanently plugged and abandoned prior to the end of operations

WBM and cuttings will be discharged to sea. Mud and cuttings from the 171/2", 121/4" and 81/2"sections will be returned to the rig and treated via Thermo-Mechanical Cuttings Cleaner (TCC) prior to discharge to the marine environment. Should TCC not be available the cuttings will be skipped and shipped to shore for onshore disposal.

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 environmental incident occurring as a result 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 Isabella well is in Block 30/12d in the Central North Sea approximately 259 km east of Scottish coastline and approximately 23 km west of the UK/Norwegian median line in a water depth of approximately 80 m. The project is in an area where the seabed is characterised by sand with small areas of gravelly sand. The typical wave height in the area ranges from 2.11 to 2.4 m.

Site specific surveys indicate that sediments in the area consist predominantly of fine

silty sand with areas of increased shell debris. The Isabella area predominantly comprises sand with a biotope classification of Offshore deep circalittoral sand and deep circalittoral mixed sediments. This habitat is thought to be of low conservation significance. The predominant species detected in site surveys were Annelida (Polychaeta), Anthropoda (Crustacea), Mollusca. Surveys showed the presence of Ocean Quahog but in low levels only. Solitary specimens of sea pens were also detected though not to the extent that the OSPAR habitat 'Seapen and burrowing megafauna communities' would be present. Ocean Quahog were present but in low densities. Additionally, individual Horse Mussels (*Modiolus modiolus*) were recorded, however no evidence of the horse mussel beds was found.

The Fulmar Marine Conservation Zone is approximately 2km to the south of the Isabella well. It is designated for four features: subtidal mud, subtidal sands, subtidal mixed sediments, and Ocean Quahog. The impact of the cement and cuttings discharges are assessed, and the conclusion drawn that the impacts of these discharges will not be significant.

Fish spawning and nursery activity will occur in the area, which may coincide with the drilling operations. The proposed drilling period coincides with the spawning periods for cod, lemon sole, mackerel, Norway pout, plaice and sandeel.

Minke whale, white beaked dolphin, common dolphin, harbour porpoise and Atlantic white-sided dolphin have been recorded in the vicinity of the Isabella field. Densities of these species range from moderate to low throughout the year. Seals are not expected to be seen at this remote location.

Seabird vulnerability in Block 30/12 is predominantly low all year with the exception of February where the sensitivity is medium.

The project area is targeted by the fishing industry for demersal and shellfish species and the effort in the area is rated low.

The Isabella 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 licence conditions or military training areas within the Isabella area on behalf of the Ministry of Defence.

The closest wrecks to the Isabella well location are un-named, non-dangerous wreck approximately 2 km away and another on the southwest boundary of the 2019 survey area, located approximately 3.2 km from the proposed well location. This wreck does not feature any protected status and not considered to be at risk from the drilling operations. There are no scheduled monument war graves, Historic Marine Protected Areas or other wrecks located within the vicinity of the Isabella Field.

The closest active telecommunication cables are the TAMPNET cable located 7 km to the southwest and the NORSEA COM1 SEG cable located 38 km to the northeast.

There are no planned renewable energy developments nearby.

The vessel traffic survey identified that the development is in an area of low commercial traffic density with one low density shipping route and one low to moderate density shipping route within 10 nautical miles of the well.

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 will be a 500 m radius safety zone around the drilling operation excluding unauthorised access of vessels and prohibiting access to fishing vessels.

Water Based Mud and cuttings will be discharged to sea. With consideration of the low toxicity of the WBM and the quantity of cuttings discharged the environmental impact of drilling discharges at the Isabella well on the surrounding marine environment is likely to be negligible. Physical smothering of the benthos in the immediate area was considered and re-colonisation was expected to be relatively rapid. The discharge of these cuttings was not expected to impact on the Fulmar MCZ designated seabed features, it being 2km away.

Cuttings will be generated from the sections drilled with OBM and these will be processed using a Thermo-Mechanical Cuttings Cleaner prior to discharge to sea. Should the TCC not be available cuttings will be skipped and shipped to shore. The TCC discharges have been assessed and the expectations is that the powder will be dispersed over a wide area and in a thin layer. The impact of this is not considered to be significant.

The cumulative impact of the discharge of the drilling cuttings (including TCC powder) and cement from the Isabella appraisal well operations is likely to affect the benthic community in the immediate area by burying some animals and impairing the feeding and respiratory system of others. The magnitude of any such impacts is unlikely to be significant given the localised and short-term nature of the increased suspended solids.

Discharge of offshore chemicals associated with the drilling 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 will result in the discharge of wastewater containing residual base oil from the OBM. This will be treated using a filtration system. Slops will also be discharged after treatment to minimise the residual oil content. These discharges have been assessed and are not considered to have a likely significant effect on the environment.

Although there are fish spawning and nursery activity in the vicinity of the well at certain times of the year these do not take place at the same time as operations resulting in the discharge of WBM or cuttings discharges.

There are no expected transboundary effects from the drilling operations at the Isabella location. The nearest boundary (UK/Norwegian median) is located approximately 23 km east 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 atmospheric emissions associated with the project result from power demand for the proposed operations. Drilling facilities are integrated on the MODU and use the electricity generated by vessel's combustion plant. It is expected these emissions will be rapidly dispersed and are not likely to have a significant impact.

Drilling operations will be conducted from the Noble Sam Hartley jack up rig operating within a 500m exclusion zone and with the required inputs made to the Kingfisher database to ensure the presence of the rig is known. This rig will also be marked in accordance with the standard marking schedule to mitigate against collision hazards. It is considered that the drilling of the well 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 30/12. Additionally, both fishing activity and shipping activity within Block 30/12 is considered relatively low.

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 thus 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:

Not Applicable