

Our Ref: 01.01.01.01-5257U
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Offshore Petroleum Regulator
for Environment & Decommissioning

SHELL U.K. LIMITED
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Registered No.: 00140141

Date: 6th January 2023

Department for Business, Energy
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Tel [REDACTED]

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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
GALLEON PN
WELL INTERVENTION FLARING**

I refer to your amended application dated 6th January 2023, reference PR/2316/1 (Version 2).

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**

**GALLEON PN
WELL INTERVENTION FLARING**

PR/2316/1 (Version 2)

Whereas SHELL U.K. LIMITED has made an application dated 6th January 2023, 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 applications, WONS/14967/0/EWT/1 (Version 2), WONS/14949/0/EWT/1 (Version 2), WONS/14945/0/EWT/1 (Version 2), WONS/14725/0/WT/1 (Version 1), WONS/14949/1/EWT/1 (Version 1) and FCON/6469/0.

Effective Date: 6th January 2023



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 17 November 2022.

2 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.

3 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.

4 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.

5 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.

6 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).

7 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:

N/A

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]



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 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

- Well intervention at wells PN02, PN03, PN06 ad PN09 using the Seafox 4 jack-up multi-support and accommodation unit to clean out the wells and restore production;
- Well testing, resulting in the non-routine flaring of gas

Description of the Project

Variation - PR/2316/1 (Version 2)

This variation permits the increaased flaring at well PN03 due to operational issues encountered. Aside from a marginal increase to flaring emissions which has been updated below, all other decision reasons remain valid.

The well intervention activities will be facilitated by the jack-up multi-support and



accommodation unit, Seafox 4, and may take up to 68 days to complete. The project will be supported by three tugs, a supply vessel, an emergency response and rescue vessel and helicopter trips.

Following well intervention, the wells will be subject to well testing. Gas produced during well testing will preferentially be flowed to the Galleon PN process where available, but some non-routine flaring of hydrocarbons is expected to occur. Non-routine flaring will take place during well clean-up and testing with a maximum flaring period in excess of 96 hours and involve flaring of gas up to 1,239.24 tonnes of oil equivalent. Discharges of chemicals associated with the proposed activities have been separately assessed under WIA/1251 - CP/2696 and there is no expected significant impact. Well intervention is planned to begin in November 2022, and the screening direction covers the period 17 November 2022 to 28 February 2023. No cumulative impacts are expected to occur with any other existing or approved projects. The risk of a major accidents and environmental effects from major accidents, 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.

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.

No nuisances are foreseen from the project.

Location of the Project

Having regard 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 Galleon PN location lies within a seaward licenced area, which has been licenced for the exploration and extraction of hydrocarbons. The project is located approximately 71 km east from the east coastline of England and approximately 72 km the UK/Netherlands median line, in an area where water depth is approximately 24 m. The predominant current in the location is dominated by the Scottish coastal water current from the north. The project location is within the Southern North Sea SAC protected area and 0.8km distant from the North Norfolk Sandbanks and Saturn Reef SAC.

The 2020 site-specific survey identified the seabed as comprising sand with shell fragments and occasional gravel, with mega ripples. Further to this sand waves are also present in the southerly part of the location. The benthic fauna in the location is noted to be scarce but includes hyrozoa, bryozoa starfish, brittle stars, hermit crabs and anemones.

The project works and timing will take place at a time when a number of fish species may be found to using the area as spawning, juvenile or nursery locations. Sightings of cetaceans, particularly harbour porpoise, have been made all year but in low



numbers. Seals are not expected to be seen at the remote location. Seabirds are common in the area during November to February and have an extremely high sensitivity to oil pollution during this time. The project area is primarily used for demersal fishing, but with a very low historical effort. Shipping intensity at the project location is high. There are no other oil and gas installations in the vicinity of the project location. The nearest active windfarm is located 38km distant and there are aggregate mines present in the vicinity neither of these are expected to be impacted by the project. The project is located in a military training ground. There are no wrecks of historical significance in the vicinity of the project.

Given the location of the project, the areas identified at paragraphs 2(c)(i), (iii), (iv), (v), (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 focus on the predominant impacts resulting from physical presence from the rig / vessels, atmospheric emissions from vessel use, and flare activities, planned discharges to sea from chemical use, seabed disturbance from siting the rig and drilling discharges, and accidental events such as a condensate release.

The Seafox 4 and support vessels have the potential to cause interference to other users of the sea, namely fishermen and vessel traffic, however the rig and support vessels will be located in a safety zone for the Galleon PN installation. The rig presence within the safety zone means only authorised vessels would be allowed within the 500 m radius of the proposed activities, therefore excluding other users of the sea. An emergency response and rescue vessel will be on site continually to monitor for vessel traffic and provide alerts to other users of the sea.

Emissions to air will occur from two main sources, (1) combustion plant used on the Seafox 4, support vessels and helicopters and (2) the proposed flaring activity. The quantity of carbon dioxide equivalent from the MODU, support vessels and helicopter use amounts to 0.05% of the 2020 total carbon dioxide equivalent (CO₂e) emissions from annual upstream offshore oil and gas activity. Flaring from the project for a worst-case flow period, results in a CO₂e of 0.66% of the total UK upstream offshore oil and gas flaring emissions based on 2020 data. The MODU, support vessel, helicopter and flaring emissions 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. The impact of the flaring emissions will be mitigated by diverting as much hydrocarbon produced as possible to the Galleon PN production facilities rather than flaring.

There are no predicted expected transboundary impacts because of the project.



In the event that an unlikely and unplanned accidental condensate release scenario from a well blow-out was realised, conservative proxy modelling based on pipeline rupture suggests that no beaching of hydrocarbon would occur and that a major environmental incident would not be likely. An approved Oil Spill Emergency Plan to manage hydrocarbon releases will be in place prior to activities being undertaken.

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.