

Our Ref: 01.01.01.01-5485U
UKOP Doc Ref:1260949



Offshore Petroleum Regulator
for Environment & Decommissioning

BP EXPLORATION OPERATING COMPANY LIMITED
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Registered No.: 00305943

Date: 10th February 2023

Department for Business, Energy
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Dear Sir / Madam

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

**Ben Lawers 204/23 - 204/23-31, Ocean GreatWhite DRILLING EXPLORATION
WELL 204/23a- 204/23-3 planned well**

A screening direction for the project detailed in your application, reference DR/2344/0 (Version 2), dated 3rd February 2023 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**

**Ben Lawers 204/23 - 204/23-31, Ocean GreatWhite DRILLING EXPLORATION
WELL 204/23a- 204/23-3 planned well**

DR/2344/0 (Version 2)

Whereas BP EXPLORATION OPERATING COMPANY LIMITED has made an application dated 3rd February 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 application, WONS/14817/0/IDA/1.

Effective Date: 10th February 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

The screening direction shall be valid from 15 February 2023 until 31 May 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]
Fax



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. 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 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

- Drilling of 42" section with seawater and spud mud.
- Drilling of 26" section with seawater and spud mud.
- Drilling of 17.5" section with Water based Mud (WBM).
- Drilling of 12.25" section using Low Toxicity Oil Based Mud (LTOBM).
- Wireline logging.
- Plug and abandonment.

Description of project

This project covers the drilling of exploration well 204/23a - 204/23-31 using the Ocean Great White semi-submersible drilling rig.



The well will be drilled with a combination of Seawater, spud mud, WBM and LTOBM. The fluids and cuttings from the 42" and 26" sections will be discharged at the seabed, from the 17.5" at the surface from the rig. Fluids and cuttings generated in the LTOBM 12.25" section will be skipped and shipped. Once the well sections have been drilled, casings will be run, and cement will be used to provide integrity of the well. On completion of the drilling operations, in the success case, the well be logged using wireline logging. The well will then be plugged and abandoned using 3 cement plugs. Operations are expected to take a maximum of 62 days.

No cumulative impacts are expected to occur between this project and other existing projects due to the distance between them.

It is not considered to be likely that the project will be affected by natural disasters. 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 project is located in the Ben Lawers field, West of Shetland (WoS), which is in block 204/23, 25.4 kilometres (km) west of the Glen Lyon FPSO, c. 20 km from the UK/Faeroe Island median line, c. 130 km northwest of the Orkney Islands and c. 154 km west of the Shetland Islands in a water depth of 519 metres (m).

WoS current speeds are between 0.26 m/s and 0.5 m/s during spring peak flow, and during neap peak flow are between 0.11 m/s and 0.25 m/s. The mean spring tidal range is between 2 m and 3 m. Mean significant wave height in the area is 2.92 m and the annual mean wave power is 46.34 kW/m. In the Ben Lawers area the mean annual mean surface temperature in the area is approximately 9.5 C whilst the annual mean seabed temperature is approximately 4 C. Salinity in the Ben Lawers area varies between c. 35.4 g/kg at the surface and c.35 g/kg at the seabed

The 2022 surveys (2022a/b) show that the majority of the seabed is covered in a layer of gravel and/or sand and thus qualify as the PMF habitat "Offshore subtidal sands and gravels". The project is in an area characterised by gravelly muddy sand. Specific site surveys identified sediments with low to moderate reflectivity which are stated to be consistent with loose fine to medium grain silty gravelly sand with shell fragments and occasional boulders and cobbles. Areas of higher reflectivity were also recorded and stated to be boulders. Numerous seabed features are present throughout the Ben Lawers survey area, these include trawl scars, boulders, seabed



mounds, and anthropogenic debris. Nearby sample stations indicated that total hydrocarbon concentrations (THC) were between 1.9 and 3.2 g g⁻¹.

The seabed in the Ben Lawers area was found to contain several benthic habitats and communities. The surveys recorded deep sea sponge assemblages at low abundances across all camera transects. In a subsequent habitat assessment, it was determined that the density of the deep-sea sponge assemblages did not occur at a sufficient density to be classified as Deep-Sea sponge aggregations

Sea bird sensitivity in Block 204/23 is generally low to medium throughout the year. The exception is June when it is regarded as High.

The proposed operations will coincide with fish spawning and/or nursery activity for a number of species.

Eight species of cetacean, minke whale, long finned pilot whale, white beaked dolphin, harbour porpoise, killer whales, sperm whales, fin whales, and Risso's dolphins occur in the area at low densities, with Atlantic white-sided dolphins occurring at low to moderate densities.

The only protected site within 40 km of the proposed drill site is the Faroe-Shetland Sponge Belt NCMPA, which is located around c. 7.04 km northeast.

The project is in the National Marine Plan Area for Scotland. Numerous cetacean species are present in the area in low densities during the operational period. Harbour and grey seals are unlikely to occur in the area.

The project is located in an area of very low shipping density.

Fishing effort in the area is low.

There are a number of subsea structures in the vicinity the closest of which lies c.7 km northwest of the drilling site. The project is not located within or near any military practice and exercise areas (PEXA), nor are there any Ministry of Defence (MoD) related block restraints on Block 204/23. There are no aggregate extraction areas or subsea telecommunication cables within the vicinity. Block 204/23 does intersect with an Innovation and Targeted Oil and Gas (INTOG) area, INTOG-WoS-c however the proposed drilling location is 7.7 km southeast of the area. There are no wrecks, offshore wind farms or aquaculture sites or shellfish protected areas within the immediate vicinity of the Ben Lawers area.

Given the location of the project, it is not likely that the areas identified at paragraphs 2(c)(i), (iii), (iv), (vi), (vii) and (viii) 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 temporary 500 m safety exclusion zone around the Ocean GreatWhite MODU during the drilling activities, excluding unauthorised access of vessels and prohibiting access to fishing vessels. An Emergency Response and Rescue Vessel (ERRV) will be on site and in addition to providing emergency support to the Ocean GreatWhite, it will act as a guard vessel advising other users of the presence of the mooring anchors and lines which will extend beyond the 500 m exclusion zone. The potential snagging hazard to fishing gear, as a result of the pre-laid anchors on the seabed, has been assessed by bp HSE and is thought to pose a minimal hazard to fishing activities. All appropriate notifications to mariners will be made prior to the well drilling activities commencing. Given that the Ben Lawers exploration well is located in an area considered to be of low importance to the UK fishing industry, is in an area which has very low shipping density, and the drilling campaign is of a relatively short duration, any impacts on other sea users is not considered to be significant.

Seabed impacts will primarily arise from anchoring of the Ocean GreatWhite MODU and the discharge of drill cuttings. The MODU will be positioned and held on location using eight anchors. There will be some lateral movement of the mooring lines that are in contact with the seabed, however, the predicted area impacted from the anchors and anchor chains, is expected to be minimal with flora and fauna recovering quickly.

Atmospheric emissions will arise from the use of the Ocean GreatWhite MODU and other associated vessels. Atmospheric emissions, when compared with total UK figures, are considered to present a relatively small contribution. Furthermore, the temporary nature of the emissions along with the remote geographic location and winds within the offshore environment, means that the atmospheric emissions would be rapidly dispersed and are not likely to be detectable within a short distance from the source. Therefore, while atmospheric emissions will make a cumulative contribution to global climate change, they are not considered to present a significant local environmental impact.

Fish, marine mammals and benthic species (which may be PMFs, Annex II species and EPSs) are not considered to be significantly impacted. This includes noise impacts to marine mammals, as drilling and vessel noise is deemed below levels which present a significant risk.

Drill cuttings modelling has been conducted and concluded that the discharge of the drill cuttings is not expected to result in a significant adverse impact to the marine environment.



Discharge of offshore chemicals associated with the drilling of the well, cementing and abandonment operations have been assessed as not likely to have a significant effect on the environment. Offshore chemicals associated with LTOBM will be skipped and shipped.

The nearest boundary lines are 20 km southeast and c. 369 km west of the UK/Faroe Islands and UK/Norwegian median lines respectively such that no transboundary impacts are expected.

There are no SPAs, SACs or SCIs in the immediate vicinity of the Ben Lawers exploration well. The Ben Lawers exploration well is located c. 7.04 km southwest of the Faroe-Shetland Sponge belt NCMPA.

Although not a planned activity, a worst-case major accident scenario resulting from a potential well blow-out was modelled and assessed. 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 that 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 drilling operations do not contradict any of the Scottish National Marine Plan objectives and policies.

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.

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:

N/A