

Our Ref: 01.01.01.01-5501U  
UKOP Doc Ref:1267157



Offshore Petroleum Regulator  
for Environment & Decommissioning

INEOS UK SNS LIMITED  
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Registered No.: 01021338

Date: 24th March 2023

Department for Business, Energy  
& Industrial Strategy

AB1 Building  
Crimon Place  
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[www.gov.uk/beis](http://www.gov.uk/beis)  
[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  
BREAGH, Breagh Platform, Maersk Resilient DRILLING PRODUCER WELL  
42/13- 5Y (42/13a-A2)**

A screening direction for the project detailed in your application, reference DR/2348/0 (Version 3), dated 21st March 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](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**

**BREAGH, Breagh Platform, Maersk Resilient DRILLING PRODUCER WELL  
42/13- 5Y (42/13a-A2)**

**DR/2348/0 (Version 3)**

Whereas INEOS UK SNS LIMITED has made an application dated 21st March 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/15156/0/GS/1

Effective Date: 24th March 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 1 April 2023 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](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:

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, 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:

#### **Description of the Project**

Well A2 will be drilled as a sidetrack well from well A2ST to enhance gas production at the Breagh Alpha platform. The well will be drilled with LTOBM and there will be no cuttings or mud discharges to the marine environment. Two contingency sidetracks have been included for the well to allow for a worst case drilling scenario to be assessed. Operations are expected to last a total of 65 days. The proposed project area is within a well developed area of the Southern North Sea (SNS) 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 with 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 proposed drilling project is located in the Breagh field in the Southern North Sea, in UKCS Block 42/13a, approximately 60 kilometres (km) east from the UK coastline at Flamborough Head, and 178 km from the UK/Dutch Median Line, in a depth of approximately 62m.

The seabed at Breagh is relatively flat, deepening from the centre to the northeast of the survey site. The sediments around the site comprise fine sand, with areas to the west of exposed underlying chalk and areas of clay to the east. The survey at the platform location found fairly uniform sediment distribution, characterised by fine sand with gravelly patches. A seabed survey of the proposed

location of the MODU confirmed the gradual slope towards the northeast and identified a series of spud can depressions from previous campaigns.

Surveys around the Breagh platform location demonstrated that the faunal community was largely uniform, with low numbers of both taxa and individuals spread largely evenly across samples. The platform survey did not identify the presence of biogenic reefs or other sensitive habitats. No Annex I habitats or communities of conservation significance (including both methane-derived authigenic carbonates and potential stony reefs) were present within the survey area.

The Breagh area is not situated within any conservation areas, with the nearest area of conservation interest being the Southern North Sea SAC located 2.1km to the east. This site is designated due to the presence of harbour porpoises. Dogger bank is located 35km to the east of the proposed project location, which is designated for the presence of sandbanks. The nearest is 4km south of the Breagh pipeline, off the Yorkshire Coast. The closest Marine Conservation Zone (MCZ) area is Runswick Bay, which is designated for its subsurface features of high energy intertidal rock, mixed sediments and ocean quahog. The proposed project area is also located





within the boundary of the North East Inshore and North East Offshore Marine Plan area, with the plan area policies considered within this application.

Minke whale, bottlenose dolphin, white beaked dolphin and harbour porpoise have all been recorded in the vicinity of the Breagh area. Densities of the species are categorised as low to moderate, with the exception of the minke whale and white beaked dolphin which are high in July and the and harbour porpoise which is high in July and August. Grey and harbour seals may be encountered, and density maps show the presence of grey seals in the area of the Breagh field as 0.43 seals per 5km<sup>2</sup>. It is unlikely that harbour seals are likely to frequent the area.

Seabird oil sensitivity in the vicinity of the Breagh field is very high in June, high in September and low in July and August. ow to medium in the summer months and increases to medium sensitivity to high sensitivity towards the end of the year.

The Breagh field lies within fishing designated ICES rectangle 38F0 and the proposed operations will coincide with fish spawning and/or nursery activity for a number of species. Fishing effort in the area is designated as of low importance, with shellfish dominating the species type. Fishing in the area accounted for 0.07% of the total UK value, and 0.06% of the total live weight landed for 2020. It is not anticipated that the drilling of A2 well will have a significant impact on the fishing industry in the area.

The Hornsea Project One wind farm development is 53 km to the south east of the project location, with the Dogger Bank wind farm development 74 km to the north east. The closest oil and gas installation is the Garrow Normally Unmanned Installation (NUI), which is 45 km to the south. There are no subsea telecommunication cables in the block, and due to the proximity to the coast, there is likely to be a moderate number of recreational users during the summer months. There are 95 wrecks within a 40km radius of the Breagh platform, with the closest wreck located within the Breagh field as 3.1 km to the north east and 6.8 km to the south west of the platform. Block 42/13 is within a Ministry of Defence (MoD) training ground and shipping density in the area is considered moderate.

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.



The Noble Resilient MODU will be located in the 500 m zone of the Breagh platform excluding unauthorised access of vessels and prohibiting access to fishing vessels. In addition, the MODU have no objections to the presence of the MODU and a survey in the area in which the MODU will be located identified no wreck debris in the vicinity. No additional impacts to other marine users are identified as part of the drilling of well A2. Therefore, there are no significant effects likely in terms of physical presence from the proposed project.

Cuttings and mud from drilling of the well will be shipped to shore, therefore there will be no seabed disturbance as a result of the drilling operations. However there will be seabed disturbance from the MoDU anchors and anchor chains which is a temporary are of seabed disturbance of 0.0035 km<sup>2</sup>. It should be noted that the Noble Resilient is already on location for undertaking velocity string work at Breagh Alpha Platform, and the seabed disturbance was assessed as part of that application. Seabed disturbance and its assessment has been included for the drilling of well A2 for completeness. There will be mortality of some individual species, but there are no annex I habitats identified or sensitive benthic species within the area, and it is considered likely that any impact on populations levels on benthic organisms across the North Sea is unlikely to be significant.

The proposed operation will utilise a standby vessel, a supply vessel and a helicopter along with the MoDU. Atmospheric emissions have been assessed from the diesel used for each vessel (including the drilling rig itself), the time spent on location and the emissions from well testing and flaring. The total atmospheric emissions from the vessels undertaking the project work and the well test emissions, as CO<sub>2</sub>(e), is approx. 14210 tonnes and accounts for 0.069% of the total UKCS CO<sub>2</sub> emissions (using 2018 as a baseline). The developer is aware of the oil and gas sectors commitment to reducing atmospheric emissions, and has committed to work towards the net zero target by 2050. The developer has also set its own target to reducing emissions, with a group wide target of 33% reduction compared to the 2019 baseline. Emissions Reduction Action Plans (ERAPs) and Methane Action Plans (MAP) have also been submitted to the NSTA which include flare and venting management plans to show commitment to working towards the Government net zero targets.

Noise generated from the project activities will not be significant, and it is concluded that the project 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 A2 well. The nearest boundary (UK/Norwegian median) is located approximately 178 km from the proposed well location. It is not considered likely that any planned operational discharge (chemicals) will be detectable at this distance from the well location.

The well to be drilled is a gas and condensate well, and an assessment has been included within the project proposal to assess as a worst case, an uncontrolled well blow out from the Breagh field, and the subsequent potential for a Major Environmental Incident (MEI). The assessment concluded that there is no potential for an MEI to occur and the developer has suitable mitigation in place to prevent such



an occurrence.

The drilling operations are in accordance with the North East Inshore and North East Offshore Marine Plan area objectives and policies. It is considered that the drilling of the Breagh well is not likely to have a significant impact on other offshore activities or other users of the sea and no cumulative impacts are expected to occur.

## **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