

Our Ref: 01.08.06.15/508C
UKOP Doc Ref:1298526



Offshore Petroleum Regulator
for Environment & Decommissioning

DANA PETROLEUM (E&P) LIMITED
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Registered No.: 02294746

Date: 28th September 2023

Department for Energy Security &
Net Zero

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Aberdeen
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OPRED@Energysecurity.gov.uk

Dear Sir / Madam

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

A screening direction for the project detailed in your application, reference PR/2408/0 (Version 2), dated 6th September 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 OPRED@Energysecurity.gov.uk.

Yours faithfully

Signature valid

Digitally signed by Environmental Section
Date: 2023.09.28 11:03:00 BST
Reason: On behalf of the Department for Energy
Security and Net Zero
Location: The Department for Energy Security and
Net Zero



**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**

SAXON FIELD INCREASE PRODUCTION

PR/2408/0 (Version 2)

Whereas DANA PETROLEUM (E&P) LIMITED has made an application dated 6th September 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, PCON/6613.

Effective Date: 28th September 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 29 September 2023.

2 Change to production level(s)

The holder of the screening direction shall ensure that the change in the level(s) of production do not exceed the amended level(s) detailed in the application for the screening direction, and in the application for consent relating to the approval for the getting of petroleum issued under the relevant production licence Model Clause.

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, using the appropriate Environmental Emissions Monitoring System (EEMS) reporting forms.

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:

OPRED@Energysecurity.gov.uk

or

Offshore Petroleum Regulator for Environment & Decommissioning
Department for Energy Security & Net Zero
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, 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

Increase in gas and oil production from the Saxon field for 2023, 2024 and 2025.

Description of project

This project consists of an increase in gas production of less than 500,000 cubic metres per day and oil production of less than 500 tonnes per day at the Saxon field. This is owing to upgrades to the Guillemot Separator in 2023 which will result in increased throughput capacity.

No cumulative impacts are expected to occur with any other existing or approved projects.

There is no change to the assessment of a major accident. 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.

It is not considered to be likely that the project will be affected by natural disasters.

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 Saxon field is located in 21/23b. It is produced back to the Triton Floating Production Storage and Offloading (FPSO) vessel located in block 21/30 in the central North Sea (CNS). It lies approximately 170 kilometres (km) from the Scottish coast and 86 km from the UK/Netherlands median line, in an approximate water depth of 90 metres (m). The predominant direction of currents within the Triton area is south easterly. Tidal currents are between 0.01 - 1.0 m/s. Winds are highly variable but in winter predominantly southwest and north north-east and typically 6-11m/s but also less frequently 17-32m/s.

The sediments in the area of the site comprise sand and slightly gravelly sand. A survey at the platform location found fine to very fine sands with little evidence of historic drilling activity. Surveys done around the Triton FPSO demonstrated that overall, the faunal community was largely uniform, with low numbers of both taxa and individuals, spread evenly across the survey samples.

The Scottish Priority Marine Feature (PMF) 'offshore subtidal sands and gravels' occurs in the area of the FPSO. Surveys found a low number of sea pens but no 'plains of fine mud' which would identify it as the OSPAR threatened or declining habitat for 'seapens and burrowing megafauna communities'. Ocean quahog, listed under OSPAR and a Priority Marine Feature (PMF) was found in low numbers as juveniles rather than adults.

No habitat of national interest (Annex I, Habitats Directive) was identified during surveys, the nearest qualifying site being Scanner Pockmark SAC (Special Area of Conservation), 133km northeast, however the East of Gannet and Montrose Nature Conservation Marine Protected Area is 5.5km from Triton FPSO, qualifying features being deep sea mud, sand and gravel habitat and ocean quahog.

The project is located within international Council for the Exploration of the Sea (ICES (International Council for the Exploration of the Sea)) rectangle 43F0 noted for Scottish PMF anglerfish, herring, mackerel, blue whiting, cod, ling, Norway pout, sandeel, spurdog and whiting with spawning of Norway pout, Norway lobster, cod, sandeel, mackerel and lemon sole and nursery activity which will coincide with operations. Commercial species are mostly demersal by weight and value but the contribution of the ICES area to UK weight and value is small.



Harbour porpoise, minke whale, white beaked dolphin and Atlantic white-sided dolphin have been recorded around Triton FPSO with densities from high to low throughout the year. All are 'species of national interest' and PMF (all listed as Annex IV European protected species and harbour porpoise also Annex II listed species). Triton is 170km from shore and therefore not likely to have a high number of grey or harbour seals, also 'species of national interest' (Annex II species).

Seabirds in the area include northern fulmar/ gannet, pomarine/ Arctic/ long tailed/ great skua, black legged kittiwake, great black backed/ lesser great black backed/ herring gull, common guillemot, razorbill, little auk and Atlantic puffin with northern fulmar, black legged kittiwake and common guillemot in decline. Seabird vulnerability to accidental spill is low all year but there is no data for November. Triton FPSO is 170km from shore which has several protections for species and habitats of national importance.

Shipping density in the area is low with the nearest oil and gas installation 11km northeast. There is no military restriction, no marine cables, wrecks or other development in the area.

Given the location of the project, it is not likely that the areas identified at paragraphs 2(c)(i), (iii), (iv), (vi), (vii) or (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 of emissions/ discharges on the environment from the activities associated with the project were assessed. 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 request to revise the production consent for oil and gas at the Saxon field is within the capacity of the existing Triton FPSO production system and facilities with no hardware modifications. An overall decline in production is noted for this installation.

There will be no change to flare levels which are independent of production and due to safety events and plant unavailability. Gas will be combusted to work compressors rather than maintain turbine fixed speed drive with minimal change to turbine load. The increase in production at Saxon field is considered with regard to changes in production from other fields produced at Triton with a longer term decline in production. There will therefore be no change to the number of shuttle tanker journeys and associated venting. There will be no change to permitted emissions and they will remain below the annual emissions limit for large combustion plant open cycle gas turbines. Emissions from combustion contribute to climate change and will be kept to a minimum. They disperse rapidly offshore with no likely significant effect

on population or human health.

There will be no significant change to the volume of produced water as a result of the Saxon field production increase, or to its management or permitted discharge. Chemical use and discharge can increase with production, however there will be no changes or additions to chemicals used or discharged at Triton. All chemicals are risk assessed and managed. Discharge to sea will not be toxic or bioaccumulating.

The risk of an accidental unplanned event resulting in a spill remains the same and the asset has an up-to-date emergency response plan, active risk management and controls in place.

There are no significant transboundary effects from the operations. No significant cumulative impacts are expected to occur because of this project or with other existing or approved projects in the wider area.

It is considered that the increase in oil and gas production from the Saxon field is not likely to have a significant impact on other offshore activities or other users of the sea, the seabed, marine life or cetacean species and no cumulative impacts are expected to occur.

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.