

Our Ref: 01.08.06.15/512C
UKOP Doc Ref:1300829



Offshore Petroleum Regulator
for Environment & Decommissioning

CHRYSAOR (U.K.) BRITANNIA LIMITED
23 LOWER BELGRAVE STREET
LONDON
SW1W 0NR

Registered No.: 02954364

Date: 10th October 2023

Department for Energy Security &
Net Zero

AB1 Building
Crimon Place
Aberdeen
AB10 1BJ

Tel [REDACTED]

Fax

www.gov.uk/beis
opred@energysecurity.gov.uk

Dear Sir / Madam

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

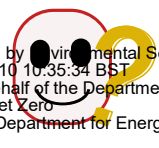
Brodgar Production Increase

A screening direction for the project detailed in your application, reference PR/2423/0 (Version 1), dated 12th 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

Validity Unknown


Digitally signed by Environmental Section
Date: 2023.10.10 10:35:34 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**

Brodgar Production Increase

PR/2423/0 (Version 1)

Whereas CHRYSAOR (U.K.) BRITANNIA LIMITED has made an application dated 12th 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/6570/0.

Effective Date: 10th October 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 10 October 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 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:

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

SCHEDULE OF SCREENING DIRECTION DECISION REASONS

The following provides a summary of the assessment undertaken 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

Development and Production Consent for the Brodgar field for years 2024 to 2026 inclusive.

Description of the project

The project is a new Production Consent (PCON) for the Brodgar field for years 2024 to 2026. This is a continuation of production at the field, which first started in 2008. Compared to the production figures for 2023 (which represent the baseline in the proposed consent) there will be a decrease in production during year 1 followed by a subsequent increase in the maximum oil production rate (relative to the 2023 baseline) in the second and third years of the application period. The average



maximum oil production rate for the application period is less than the currently consented 2023 baseline.

The extension in forecasted production is due to developments and interventions in the Brodgar field namely routing it to Long Term Compression (LTC) and development of the Brodgar East infill well.

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

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 Brodgar development is located in Block 21/3a in the Central North Sea (CNS) in approximately 145m of water. The field has been developed as a subsea tie-back of 4 wells, all of which are connected to the Brodgar production manifold, producing back to Britannia via the Britannia Bridge Linked Platform (encompassing Britannia production installation referred to hereafter as Britannia) located 39km to the northeast in Block 16/26 where impacts from production arise. The Britannia platform is 210 km from the nearest Scottish coastline, and 45 km from the UK/Norway line.

The predominant regional currents are the coastal and Atlantic water inflow of the Fair Isle/Dooley Current. This current flows around the north of Orkney, and then flows south until it reaches the 100 m contour of the Fladen Ground, where it turns east and circulates in the northern North Sea. The second current influencing the area is the East Shetland Atlantic Inflow, which flows just north of the Fair Isle/Dooley Current. Typical current speeds for both water bodies are 0.1 m/s.

Surveys indicate that sediments at Britannia comprise poorly sorted silt with a thin sandy clay veneer classed as 'circalittoral fine with slightly higher than background levels of hydrocarbon and metal concentrations thought to indicate historic drilling activity. The area has a number of pockmarks with elevated fines found in depressions, but none have Annex I methane derived authigenic carbonate. These annex 1 habitats do occur in the Scanner Pockmark SAC which is 30km from Britannia. Species are indicative of silty sandy sediments mainly comprising annelids (dominant by diversity and composition), molluscs, crustaceans and echinodermata



including brittlestar. The presence of heavily bioturbated substrate with burrows and mounds indicates the potential presence of OSPAR listed threatened and or declining habitat 'seapens and burrowing megafauna communities'. The OSPAR listed declining ocean quahog has also been observed in the area and is a feature of the Norwegian Boundary Sediment Plan Nature Conservation Marine Protected Area located 30km east of Britannia.

Britannia is located in International Council of the Sea (ICES) rectangle 45F1 with peak cod/ Norway pout (February, March), Norway lobster (April to June) and mackerel (May to June) and a low probability of juvenile species coinciding with operations. Scottish Priority Marine Features include anglerfish, blue whiting, cod, ling, Norway pout, herring, whiting, mackerel, sandeels and spurdog. The area is mainly targeted for shellfish followed by demersal species but total landings are low at UK level.

Seabird species include an all year breeding and wintering presence of northern fulmar and gannet, black legged kittiwake and common guillemot, a summer presence of European storm petrel, Arctic skua and tern, Lesser black backed gull and Razorbill and a winter presence of little auk and Herring gull with many species in decline but seabird sensitivity to oil spill is generally low (no data November, December).

Species of national interest (formerly Annex II) include harbour porpoise (peak May) and white-beaked dolphin are widespread with seasonal Minke whales and Atlantic white sided dolphin recorded at Britannia in moderate to low density. Grey and harbour seal species of national interest (former Annex II) are not expected due to distance from shore.

The Bodgar field is in an area with major oil and gas developments and infrastructure and there are several oil and gas fields nearby. Within the vicinity of Britannia there are no Ministry of Defence restrictions, marine cables, historic marine protected areas or war graves, but there are seven wrecks within 20km of the installation. Shipping density in the area is low.

Given the location of the project, the areas identified at paragraphs 2(c)(i), (iii), (iv), (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 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 proposed extension in oil production from the Brodgar field is the result of



interventions and developments within the field namely at the East infill well and works to move the field towards Long Term Compression (LTC). The extension is within the design capacity of the existing Britannia facilities. There will be no change to the operating mode, emissions or discharges from the Britannia platform complex, since the longer-term field production decline is only partially compensated by the forecasted Brodgar production increase. Flaring and venting operations will remain unchanged as result of the extension in oil production and therefore no significant change in the atmospheric emissions or environmental impacts are expected.

The extension in oil production is not expected to result in any change in chemical use or discharge and no change in oil in produced water for discharge is expected. There will be an increase in produced water alongside increased oil production. Marine discharges will neither be toxic or bioaccumulating and rapidly dispersed.

There are no expected transboundary impacts as a result of the project and no cumulative impacts have been identified given the other known existing and approved projects in the wider area.

It is considered that the extension in oil production from the Brodgar 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. The development is in line with the policies of the Scottish Marine Plan

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

Not applicable