

Our Ref: 01.01.01.01-5455U
UKOP Doc Ref:1305672



Offshore Petroleum Regulator
for Environment & Decommissioning

BP EXPLORATION OPERATING COMPANY LIMITED
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Registered No.: 00305943

Date: 7th November 2023

Department for Energy Security &
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Dear Sir / Madam

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

**CLAIR-RIDGE [Part of CLAIR], Clair Ridge Platform, DRILLING PRODUCER
WELL 206/08a-BS2AU311 planned well**

I refer to your amended application dated 13th October 2023, reference DR/2336/2 (Version 1).

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 OPRED@energysecurity.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**

**CLAIR-RIDGE [Part of CLAIR], Clair Ridge Platform, DRILLING PRODUCER
WELL 206/08a-BS2AU311 planned well**

DR/2336/2 (Version 1)

Whereas BP EXPLORATION OPERATING COMPANY LIMITED has made an application dated 13th October 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/14741/0/IDA/1, WONS/14831/0/C/1 and WONS/15351/0/S/1.

Effective Date: 7th November 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 12 February 2023 until 31 January 2024.

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: OPRED@energysecurity.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:

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]
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

This post screening direction amendment (ref DR/2336/2) relates to a change in end date only there is no changes to the project as listed below.

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 32" section with Water Based Mud (WBM) and seawater and sweeps.
- Drilling of 22" section with WBM
- Suspension of well.
- Drilling of 16" section with OBM.
- Drilling of 12.25" section using Low Toxicity Oil Based Mud (LTOBM).
- Drilling of 8.5" section using WBM
- Well Clean up and Completion.



Summary of the change in Project

DR/2336/2 - This is for date extension.

DR/2336/1 - The well will now be suspended after drilling of the 22" section and re-entered at a later date and drilling continued from the 16" section. The start date has been amended to account for this. The operations will be as per the below.

Description of project

This project covers the drilling of water injection well 206/08a-S2AU3I1 (B20) from the Clair Ridge Platform (CRP).

The well will be drilled with a combination of Seawater and sweeps and WBM and LTOBM. The 32" section will be drilled riserless, with WBM and cuttings discharged continuously at the seabed. WBM and cuttings from the 22" section will be discharged to sea from a cuttings caisson exiting the CRP approximately 50m below the sea surface. The well will be suspended after completion of the 22" section to allow for the drilling of the B21 well. Once this has been completed, drilling of the 16" section will recommence at the B20 well, as per the above. The primary method of disposal of suspension fluids will be discharge to sea. Cuttings generated in the LTOBM sections will be reinjected into the CRI well. WBM and cuttings from the 8.5" section will primarily be re-injected, however if this is not available these will be discharged as per the 22" section. 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, wellbore clean-up operations will be undertaken. Drilling operations are expected to take 60 days to target, 72 days to completion.

Drilling at Clair Ridge was assessed in the original scope for the Clair Ridge Development Environmental Statement (ES) which was approved 27th June 2011. A total of 36 wells are planned over approximately 12 years, with B20 being the 18th.

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 CRP is located approximately 55 kilometres (km) west of Shetland and 92 km south east of the United Kingdom-Faroes median line. The operations are part of the existing Clair Ridge development and were included in the original scope of the ES. This is the 18th well to be drilled at the development.

The project is in an area characterised by coarse sediment and sand and muddy sand with a water depth of 143 metres (m). Mean monthly significant wave heights for the area range between 3.5 m and 4.5 m in the winter months, and 1.5 m and 2 m in the summer months. Surveys indicated that areas were predominately classified as sublittoral coarse sediment. Additional habitats were identified to a lesser extent, including sublittoral sand and sublittoral mixed sediment. Survey work found that the sediments generally support a species-rich and relatively abundant macrofauna. Highly populated with juveniles, the total proportional taxa contribution around Clair Ridge consists mainly of annelids (63.4%), arthropods (15.9%), molluscs (14.6%), echinoderms (3.7%) and other (2.4%). This dominance of annelid taxa is broadly typical of the northeast Atlantic area. There is no evidence of threatened or declining species listed under OSPAR or benthic Priority Marine Features (PMF) within the Claire Ridge survey area. No species or habitats of conservation significance under the Offshore Petroleum Activities (Conservation of Habitats) Regulations 2001 (as amended) were observed within the survey area. The closest recorded Priority Marine Features are deep-sea sponge aggregations and ocean quahogs aggregations located approximately 23 km west and 69 km east of the CRP, respectively.

The project is in the National Marine Plan Area for Scotland. Numerous cetacean species are present in the area in small numbers with the exception of killer whales, pilot whales, white-beaked dolphin and white-sided dolphins, which are present in moderate numbers during the operational period. Low numbers of Grey, harbour and hooded seals are anticipated to be in the area at any time. Seabird sensitivity during the operational period ranges from low to high. Fishing effort in the area is generally low during spring and summer and highest in January.

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

Two wrecks have been identified within 7 km of the CRP. No aggregate dredging and disposal sites, sites of marine archaeological interest or planned offshore renewable energy developments have been identified within 40km of the CRP.

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 is a 500 m radius safety zone around the CRP, excluding unauthorised access of vessels and prohibiting access to fishing vessels. No additional impacts to other marine users are identified as part of the operations at B20.

Seabed disturbance from the discharge of water-based mud drill cuttings will impact a total area of 214 m². Seabed disturbance could result in the smothering and mortality of benthic fauna which will result in some short term temporary impacts however the benthic communities are expected to regenerate the area impacted by drill cuttings over time. Up to 33 m³ of cement slurry will be extruded to the seabed adjacent to the well during cementing operations. The impacts from seabed disturbance have been assessed as not likely to have significant effect.

Cuttings from the 8.5" section may be contaminated with up to 5236 kg of reservoir hydrocarbons. In addition, up to 800m³ of WBM (which includes contingency allowance) could be discharged, resulting in the discharge of up to 80kg of entrained oil. There is potential for deposition of oil contaminated solids to reduce benthic diversity by promoting colonisation by opportunistic, oil tolerant, fauna as well as by direct smothering. However, cuttings including oil contaminated cuttings/WBM will be widely dispersed, with deposition depths falling to <1mm within 100m to 300m of the discharge. The resulting deposits of hydrocarbons will be biodegraded at the sediment surface or drawn down into the sediments. Therefore, the areal extent of impact is sufficiently small to ensure the environmental impact is likely to be insignificant. In addition, any discharge of cuttings will be as a contingency as the primary option is for the cuttings to be re-injected. The impacts have therefore been assessed as not having a likely significant effect.

Discharge of offshore chemicals associated with the drilling of the well, cementing, suspension and completion operations have been assessed as not likely to have a significant effect on the environment. Offshore chemicals associated with LTOBM and well clean up will be re-injected.

There are no expected transboundary effects from the operations at B20. The nearest boundary line (UK/Faroes Median Line) is located approximately 92 km north west of the operations. It is not considered likely that any planned operational discharge (cuttings, chemicals or base oil) will be detectable at this distance from CRP.

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.

Operations at B20 will use existing platform power generation. Atmospheric emissions resulting from drilling at CRP were assessed as part of the ES and are considered to have no significant impact on the environment.

The drilling operations do not contradict any of the Scottish marine plan objectives and policies.

Operations at B20 will be conducted from the existing CRP such that there is no increase in the infrastructure footprint. No cumulative impacts are expected to occur between this project and other existing projects due to the distance between them. Impacts from the discharge of cuttings, including potential cumulative impacts from the 36 Claire Ridge wells were considered and as the drilling will occur over a 12 year period and will be dispersed over time, impacts were concluded to be localised and not significant.

The operations at B20 are not likely to have a significant impact on the two wrecks that have been identified within 7 km of the CRP.

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