

Our Ref: 01.08.06.15/287C
UKOP Doc Ref:1314270



Offshore Petroleum Regulator
for Environment & Decommissioning

TOTALENERGIES E&P UK LIMITED
10 UPPER BANK STREET
CANARY WHARF
LONDON
E14 5BF

Registered No.: 00811900

Date: 12th December 2023

Department for Energy Security &
Net Zero

AB1 Building
Crimon Place
Aberdeen
AB10 1BJ

Tel [REDACTED]
Fax [REDACTED]

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

Dear Sir / Madam

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

A screening direction for the project detailed in your application, reference PR/2421/0 (Version 3), dated 1st December 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 Department for Energy
Security and Net Zero
Date: 2023.12.12 16:22:55 GMT
Reason: On behalf of the Secretary of State
Location: Offshore Petroleum Regulator for
Environment and Decommissioning



**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**

ALWYN NORTH

PR/2421/0 (Version 3)

Whereas TOTALENERGIES E&P UK LIMITED has made an application dated 1st December 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, Alwyn North - PCON/5456, Nuggets 1 - PCON/5453, Forvie N - PCON/5917, Jura - PCON/5129, Ellon - PCON/5127 and Grant - PCON/5134.

Effective Date: 12th December 2023

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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 1 January 2024.

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

This document 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 developer 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:

Increase in production of the following fields that produce at the Alwyn North Installation:

- Alwyn North
- Nuggets 1
- Forvie North
- Jura
- Ellon
- Grant

Summary of project

The Alwyn North platform was initially planned to undergo the cessation of production (COP) at the same time of Cormorant Alpha COP. It was subsequently confirmed



that the production reserves allow to continue production from Alwyn platform beyond the COP dates of Cormorant Alpha and up until at least 2028.

The current export route from Alwyn North to Sullom Voe Terminal (SVT) via the Brent Pipeline System (BPS) will become unavailable in 2024, following the COP of Cormorant Alpha. Therefore, to maintain production from Alwyn Area a new oil export route is required.

The oil export route from Alwyn North was rerouted in Q3 2023 to the Ninian Pipeline System (NPS) and onto SVT via Ninian Central, utilising the existing pipeline PL335 following minor platform modifications on Alwyn North.

The resulting production increase has been requested by Total for the following fields that produce at Alwyn North Installation: Alwyn North (PCON/5456), Nuggets 1(PCON/5453), Forvie North(PCON/5917), Jura (PCON/5129), Ellon (PCON/5127) and Grant(PCON/5134).

Description of project

PR/2421 covers the extension of the Production of Oil and gas of the six aforementioned fields that produce at Alwyn to 2028.

The extension of production will not have a significant effect on the Atmospheric emissions at the Alwyn Installation. Additionally, the impact on Produced water volumes have been assessed and found not to have a significant impact on the environment.

No cumulative impacts are expected to occur with any other existing or approved projects. 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 North Alwyn Alpha platform is in Block 3/09a in the Northern North Sea approximately 138 km east of Shetland and approximately 9 km west of the UK/Norwegian median line in a water depth of approximately 130 m. The project is in an area characterised by sand and muddy sand. The wave height with the North



Alwyn Alpha Platform area ranges from 2.4-2.7 m.

Site specific surveys indicate that sediments in the area consist predominantly of deep circalittoral sand and deep circalittoral sediment. Seabed photography showed that visible sedentary epifauna and mobile megafauna are generally sparse across the area. Site surveys identified taxa including hermit crabs, starfish, and sea urchins, tube worms anemones and cup corals at the circalittoral sand site. Species found at the circalittoral mixed sediment site which is 1.2 km from Alwyn North had encrusting sponges, bryzoans and anemones along with sparse hermit crabs and squat lobsters. No evidence of sub tidal reefs or submarine structures were found in the vicinity of NAA. The area was assessed for Stony reef habitat, however the assessment concluded low potential for reefiness therefore were not considered to be an Annex I Habitat.

There are no marine protected areas within 40 km from the NAA and therefore it is unlikely that the project will have any effect on protected sites.

Fish spawning and nursery activity will occur in the area, which may coincide with the drilling operations. Minke whale, white beaked dolphin, long-finned pilot whale, harbour porpoise and Atlantic white-sided dolphin have been recorded in the vicinity of the NAA. Densities of these species range from high to low throughout the year. Seals are not expected to be seen at the remote location. Seabird vulnerability in Block 3/09a is predominantly low all year round. The project area is primarily used for demersal fishing and the effort in the area is rated low.

The Alwyn North field is in an area of major oil and gas developments and infrastructure and there are several oil and gas fields nearby. The installation is not located within a military exercise and danger area (PEXA) according to NMPi (2023). There is one wreck, possibly of the Blagdon, which is located north of the centre of Block 3/04. There are no scheduled monument war graves, Historic Marine Protected Areas or other wrecks located within the vicinity of the NAA. There are no known cables in the vicinity of the NAA and no planned renewable energy developments. Shipping density in the area is very low.

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 extension is a result of the rerouting of the export line, the impacts of this project have been assessed and approved under a previous Screening Direction. The increase of production until 2028 has required an assessment of the increased volume and duration that produced water will be generated as well as the additional Atmospheric emissions at the platform.

At Alwyn the primary management of produced water is via reinjection to the reservoir which mitigates the impact of any oil in water being discharged to the environment. Where reinjection is not available, the Installation have a number of short and long term actions to improve the oil in water being discharged. Total have demonstrated continual improvement to reduce this impact on the environment. Their successes are detailed within a Best Available Technology/Best Environment Practice (BAT/BEP) assessment which has been undertaken for Alwyn and Dunbar and results are included in the Oil Life Permit SATs (Alwyn North OLP/144 and Dunbar OLP/233). Upon review, the extension of the production at this installation will not have a significant impact on the environment.

Total have also assessed the impact of any additional chemical use within the produced water. As previously stated, the primary management route is reinjection which mitigates any impact on the Environment and where this cannot be achieved, Total have a strict sampling and monitoring methodology in line with the OCR regulations to ensure minimal impact to the environment.

The production extension covers an additional four years of production at the Alwyn platform. A number of measures have been put in place to maximise the efficiency of the extraction of oil and gas to ensure a low Greenhouse Gas Intensity from the installation. As a company TotalEnergies has committed to Net Zero across all its production and energy products used by its customers in Europe by 2050 or sooner (Scope 1, 2 & 3). This is expected to deliver emissions reductions consistent with the NSTD 2030 target (50% reduction from a 2018 baseline). The extension at Alwyn has been assessed in line with these targets and has found to be in line with this commitment.

The emissions from current and future operations have been reviewed against the air dispersion modelling scenarios during the BAT assessment (2020) to ensure that all the potential impacts have been captured and are still determined as not significant. LCP testing performed in 2022 covered testing of emissions from the turbines and compressors. The testing showed that the items of LCP on the Alwyn platform did not exceed the 350 mg/Nm³ ELV. In the case of the GT35 (GTGD), which had higher concentrations, the turbine is not highly loaded enough for the ELV to apply.

Total will continue to monitor and maintain the equipment to ensure that atmospheric emissions are reduced as much as possible. LCP and MCP monitoring is either ongoing (for LCP) on annual basis or is planned (for MCP) in 2024. Results of the testing inform the Company about the emissions levels against the limits and are considered in the operations to ensure there is no exceedance above the ELV levels (e.g. alarms have been set to alert the operations and asset environmental teams in



case of load exceedance for the LCP). Maintenance schedules and overhaul of equipment are programmed to minimise plant downtime and avoid trips that may lead to an increase in emissions.

Given the results of the dispersion modelling, it is considered that these elevated concentrations will be short-lived and will hardly be detectable beyond a short distance from Alwyn due to the dispersive nature of the offshore environment. It is therefore considered that no significant local or cumulative impacts from atmospheric emissions are expected from routine production operations at the Alwyn Area platforms.

There is to be no significant increase on Flaring and venting from the current conditions owing to the extension of the production at Alwyn. Where operationally possible, progressive reductions have been applied to the 2023 and 2024 production year OGA Flare Consent applications, also taking account the change in stream categorisation. Total have a target to stop all routine flaring within the next 7 years, by 2030 with a year on year reduction to achieve this goal.

There are no expected transboundary effects from the production increase at the North Alwyn Alpha Platform. The nearest boundary (UK/Norwegian median) is located approximately 9 west km of the operations. All impacts from Atmospheric emissions and associated produced water discharge will be local and short lived.

Although not a planned activity, a worst-case major accident scenario resulting from a potential well blow-out was modelled and assessed. Although the consequences of an oil spill can be severe, 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 which could have a significant impact and the proposed operations carried out as planned are not likely to have a significant effect on the environment.

No cumulative impacts are expected to occur. The Field has been developed for several years and the locations of the North Alwyn platforms are well known to other marine users and marked on the appropriate navigational charts. It is considered that the production extension is not likely to have a significant impact on other offshore oil and gas activities or other users of the sea.

There is no aggregate extraction, dredging, or dumping activity. There are no planned, consented or operational wind farms within Block 3/09a. Additionally, both fishing activity and shipping activity within Block 3/09a is considered relatively low.

Cumulative impacts have been assessed as not likely to have a significant effect on the environment.

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