

Our Ref: 01.01.01.01-5970U
UKOP Doc Ref:1328623



Offshore Petroleum Regulator
for Environment & Decommissioning

DANA PETROLEUM (E&P) LIMITED
78 CANNON STREET
LONDON
EC4N 6AF

Registered No.: 02294746

Date: 23rd February 2024

Department for Energy Security &
Net Zero

AB1 Building
Crimon Place
Aberdeen
AB10 1BJ

Tel [REDACTED]

Fax

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
PRODUCER WELL 29/01b-B1 - ST#1**

I refer to your amended application dated 22nd February 2024, reference DR/2442/1 (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**

PRODUCER WELL 29/01b-B1 - ST#1

DR/2442/1 (Version 1)

Whereas DANA PETROLEUM (E&P) LIMITED has made an application dated 22nd February 2024, 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/15949/0/GS/1 v2.

Effective Date: 23rd February 2024

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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

The screening direction shall be valid from 15 February 2024 until 31 August 2024.

2 Commencement and completion of the project

The holder of the screening direction must notify the Department for Energy Security & Net Zero (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:

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 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 change to the project

An application for a change to the screening direction was received to add;

- Two subsea transponders, to be located within 25m of the well and within the 500m safety zone. These items represent a small (<15m²) incremental impact area and will be removed at the end of operations.

The assessment below has been updated to reflect this change to the project.

Summary of the Project

- Abandonment of the 29/01b-B1 (PC) main well bore using cement plugs.
- Drilling the 8.5" and 6" x 7" sections of the sidetrack infill development well 29/01b ST#1 using Low Toxicity Oil Based Mud (LTOBM)).



- Well clean-up and completions run.

- Contingency 8.5" and 6" x 7" sections of the sidetrack infill development well 29/01b ST#1 using Low Toxicity Oil Based Mud (LTOBM)).

Description of the Project

This project is the abandonment of the 29/01b-B1 (PC) main well bore and sidetracking the well to drill 29/01/d ST#1 at the B Drill Manifold (DCB) in the Bittern field using the COSL Innovator semi-submersible mobile offshore drilling rig (MODU). The development has not been included in a previous ES.

The 29/01b ST#1 is a sidetrack well targeting oil and gas. It is estimated that drilling will take up to 120 days and with applied contingency, the rig may be on location between the period of 15th March and 31st August 2024. Anchor pre-lay is proposed from the 15th February 2024.

On arrival of the rig, two subsea transponders will be placed on the seabed to aid with positioning of the rig. These will be recovered to the rig at the end of operations.

The existing tree cap will be removed and wet stored on the seabed adjacent to the well to allow access to the well. The main wellbore contents will be bullheaded into the reservoir but as a worst case may be circulated out and treated prior to discharge. In addition, 1.7kg of gas would be vented. The tubing will then be punched using explosives (2,082m deep) and a deep-set cement plug (2,070m) pumped. Production tubing will then be cut using explosives (2,070m deep). A shallow plug will also be set across the annulus and a contingency cement plug has also been accounted for. In addition, a further contingency cement plug is applied for at the whipstock location which may be required at the sidetrack kick off point. In the event of the contingent mechanical sidetrack being required, additional cement plugs may also be required.

The existing xmas tree will be recovered and a Blow Out Preventer (BOP) installed on the marine riser and locked onto the wellhead. Lower and upper completions will be run and a new xmas tree will be installed and tested. The wet stored tree cap will then be re-installed on the new xmas tree.

The sidetrack will be drilled in two sections 8.5" and 6" x 7". Contingency to redrill the 8.5 and 6" x 7" sections has also been applied for. All sections are to be drilled using LTOBM which will be skipped and shipped for appropriate onshore disposal.

Following drilling of the 8.5" section a 7" liner will run into the hole. Once the liner is in place, this will be set in place with cement. A trial of the cement unit is also proposed which may result in a worst case cement discharge of 15.4 tonnes. Following each cementing operation, any residual cement remaining in the rig's cementing system will be discharged at or near the sea surface during the washdown process.



Lower completions will be run and a wellbore clean-up will then be performed using a wellbore clean up pill. This will be pumped and the hole will be circulated clean and displaced to inhibited completion brine.

No well test is proposed.

Upper completions will then be run and the BOP removed and a xmas tree installed.

Location of the Project

Having regard 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 29/01b ST#1 well location lies within a seaward licenced area, which has been licenced for the exploration and extraction of hydrocarbons. The project is located approximately 174 km east from the northeast coastline in Scotland and approximately 90 km from the UK/Norwegian median line, in an area where water depth is approximately 93 m. The mean residual current in the area is 0.01 m/sec. The project location is not within any protected areas, with the closest being the East of Gannet and Montrose NCMPA, approximately 20km distant. The closest SAC to the project is the Scanner Pockmarks SAC, approximately 153km distant.

The site-specific survey (2023) identified the seabed as comprising muddy sand. Benthic epifauna associated with this substrate was sparse, but included sea pens, Norway lobsters, hermit crabs, anemones, starfish, crabs and faunal turf, which are considered typical of this muddy sand sediment. 'Burrowed mud' (a Priority Marine Feature in Scottish waters) and the OSPAR listed 'threatened and / or declining species and habitats' habitats 'Sea-pen and burrowing megafauna communities' and Ocean quahog were identified from the site-specific survey. No evidence of Annex 1 habitats were identified from the site survey results.

The project works will take place at a time when several fish species may be found to be using the area as spawning or nursery locations. The drilling period coincides with cod, lemon sole, mackerel and sandeel spawning periods. Of these species, cod and sandeel are benthic dwelling / spawning species and are therefore most vulnerable to seabed disturbance.

Sightings of cetaceans have been made all year in low to high densities throughout the drilling period. Harbour porpoise are the only species observed in high numbers in July at this location with other cetacean species being recorded in medium or low densities. Seals are not expected to be seen at the remote location. Seabird vulnerability to oil pollution is low throughout the year in this location. The project area is used for pelagic, demersal and shellfish fishing, with low effort of demersal gear when compared to other UKCS ICES rectangles. Shipping intensity at the project location is low. The well is within a developed area and is located 30km distant from other oil and gas platforms. A number of exploration wells, subsea developments and pipelines are present in the wider area. The well is located within



an Offshore Wind Innovation and Targeted Oil and Gas (INTOG) area (INTOG E-a) and a proposed development is located 9km to the southeast of the well. The project is not located in a military training ground. There are no wrecks of historical significance in the vicinity of the project.

Given the location of the project, the areas identified at paragraphs 2(c)(i), (iii), (iv), (v), (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 drilling rig and supporting vessels have the potential to cause interference to other users of the sea, namely fishermen and vessel traffic, however, the drilling rig will be located within the existing 500 safety zone of DCB (with the exception of anchors which will be outwith this area) and other sea users will be notified of the project via Fish Safe and Kingfisher Information Services. To further reduce the risk to other sea users associated with the presence of anchors and chains outwith the 500m safety zone, a guard vessel will be deployed from the point of anchor pre-lay to when the anchors are removed. Fishing effort is low in the area and the mitigation proposed is considered appropriate. The impact on other sea users is deemed insignificant.

The main receptor impacted by seabed disturbance will be the benthic communities. Physical disturbance can cause mortality or displacement of benthic species in the impacted zone. The main seabed impacts associated with this application are confined to anchors / chains, with a very small localised impact area associated with temporary placement of the subsea transponders, debris cap and installation of the new xmas tree. No drill cuttings are to be discharged and cement deposits are expected to naturally disperse as opposed to consolidating in situ, with minimal environmental impact.

Recovery of faunal communities within the disturbed area may be expected following cessation of drilling and removal of the anchors / chains. Therefore, based on the above, impacts on benthic communities from drilling of the well will be localised and not significant. 'Seapens and burrowing megafauna communities' and Ocean quahog are also unlikely to be significantly impacted due to the small impact area and limited potential for cumulative impacts.

The site survey identifies a mud habitat at this location, which is not well suited to sandeel spawning, therefore sandeel are unlikely to be present. *Nephrops*, on the other hand, were observed during recent survey work, but are relatively tolerant of



smothering given their burrowing nature and are widely distributed. Impacts on *Nephrops* at the population scale are therefore considered unlikely given the small impact area.

Discharge of offshore chemicals associated with the drilling of the well, cementing and completion operations have been assessed as not likely to have a significant effect on the environment. LTOBM and cuttings will be skipped and shipped to shore for disposal, although there will be small discharges of LTOBM as a result of well clean-up operations, and small discharges of reservoir hydrocarbons to sea as a result of initial well bore abandonment, but significant impacts from these discharges on the marine environment are not considered likely.

Emissions to air will occur from the drilling rig, associated support vessels, helicopters and from gas venting during well re-entry. Emissions from the proposed drilling operations would account for only a small percentage of the total CO₂e generated on the UKCS (2022) ca. 0.136%.

The emissions are not expected to have a detrimental effect to local air quality over the long-term, it is considered that these elevated local concentrations will be short-lived and will hardly be detectable beyond a short distance from the proposed operations due to the dispersive nature of the offshore environment. The environmental effects from emissions to air are not expected to have a significant impact on the environment.

The impact of the vessel emissions will be mitigated by optimising vessel efficiency i.e., minimising the length of time the vessels are on location, minimising fuel use, avoiding the unnecessary operation of power generation / combustion equipment, minimising the venting of hydrocarbons to what is strictly necessary.

Noise associated with vessel operations and explosive use is demonstrated to be insignificant due to the frequency of the sound being below levels which are considered to represent a significant risk to marine mammals (in the case of vessel noise) and the highly localised nature of explosive use, at depths of more than 1500m below the seabed.

There is not likely to be any significant impact from the project on population or human health. It is not considered to be likely that the project will be affected by natural disasters. No pollution or nuisances are foreseen from the project.

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

There are no expected transboundary impacts because of the project.

The risk of a major accident such as a well blowout has been assessed. It was concluded that possible impacts on seabirds could constitute a Major Environmental Incident. 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.



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.