Our Ref: 01.01.01.01-5974U
UKOP Doc Ref:1330861

Offshore Petroleum Regulator
for Environment & Decommissioning

ENI UK LIMITED
ENI HOUSE
10 EBURY BRIDGE ROAD
LONDON
SW1W 8PZ

Registered No.: 00862823

Date: 7th March 2024

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
Lennox Intersection Well - 110/15-6

A screening direction for the project detailed in your application, reference DR/2443/0 (Version 5), dated 23rd February 2024 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: 2024.03.07 13:21:06 GMT
Reason: On behalf of the Secretary of State
Location: Offshore Petroleum Regulator for Environment and Decommissioning

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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

Lennox Intersection Well - 110/15-6

DR/2443/0 (Version 5)

Whereas ENI UK LIMITED has made an application dated 23rd 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/16199/0/IDA/1.

Effective Date: 7th March 2024

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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 10 March 2024 until 31 July 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 Nature of stabilisation or protection materials

Rock deposits

5,500 tonnes of clean, inert rock material, containing minimal fines, (The quantity of rock deposited should be the minimum required to provide the necessary stabilisation or protection, and any surplus rock must be returned to land).

4 Location of stabilisation or protection materials

MoDU

Within 500 metres radius of the legs of the jack-up mobile drilling unit located at:

53 degrees 37 minutes 56.686 seconds North

003 degrees 09 minutes 40.199 seconds West

5 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.

6 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.

7 Monitoring

The results of any pre or post-placement surveys carried out to confirm the necessity for the deposits covered by the screening direction and/or to confirm the accurate positioning of the stabilisation or protection materials, should be forwarded to the Department following completion of the surveys

8 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.

9 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.

10 Deposit returns

The holder of the screening direction shall submit a report to the Department following completion of the deposit covered by the screening direction, confirming the

quantity of materials deposited and the estimated area of impact, using the appropriate Environmental Emissions Monitoring System (EEMS) reporting form. Where no deposits are made, a 'nil' return is required.

11 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).

12 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 [redacted]

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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 :

- Drilling of the 36" section riseless with seawater and sweeps

- Drilling of the 24" using Water Based Mud (WBM)

- Drill 16" and 12.25" section to intersect 110/15-6 wellbore using Oil Based Mud (OBM)

- Drill 8.5" section using Oil Based Mud (OBM) to drill into existing cement plug within the 110/15-6 well and set new bridge plug

- Plug and Abandonment

- Monitor well 110/15-8 and 110/15-6 for gas

Description of project

The project consists of the drilling of the 110/15-8 intersection well using the Mobile Offshore Drilling Unit (MODU) *Valaris Norway* Jack Up drilling rig to gain access to the 110/15-6 well which has previously been plugged, abandoned and sidetracked. Remediation is required to restore pressure integrity within the well. If necessary, the MODU will be jacked down onto the seafloor with the spud cans being supported on contingent rock pads to minimise the risk of slipping or movement of the rig. Once on location the MODU will be protected by a 500m safety and dedicated EERV.

Operations for the Lennox 110/15-8 intersection well are expected to last a total of 50 days and are expected to commence 10th March 2024 and be completed by 31st July 2024. The well will consist of five sections (36", 24", 16", 12.25" and 8.5"). The top hole 36" section will be drilled riserless using seawater and sweeps with cuttings discharged at the seabed. The 24" section will be drilled using Water Based mud (WBM). Remaining sections (16", 12.25" and 8.5") will be drilled using Oil Based Muds (OBM). With the exception of the top hole 36" section, all cutting will be skipped and shipped to shore. On completion of the drilling and cementing operations the well will be plugged and abandoned, with the wellhead structure being removed. Drilling operations for the Lennox 110/15-8 intersection well are intended to complete the abandonment of well 110/15-6 and no hydrocarbons are expected. 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 hazard, for example, a well blow out, 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 project area is in Block 110/15 in the East Irish Sea in an approximate water depth of 7 metres (m), approximately 7 kilometres (km) from the Liverpool Bay coastline and 140 km of the UK / Ireland median line. The project area is located within the Liverpool Bay Special Area of Protection (SPA). The Flyde Marine Conservation Zone (MCZ) is approximately 2 km from the planned operations. The Shell Flat and Lune Deep, Dee Estuary/Aber Dyfrdwy and Morecambe Bay Special Areas of Conservation (SAC) all lie within 40km from Lennox 110/15-8 well.

The project is in an area dominated by fine sands and muds with varying compositions of mud, gravel and sand which are classified as circalittoral fine sand or circalittoral muddy sand. A recent survey observed a single isolated sand wave to the

northeast of the well. The wavelength ranged from 33-67 metres and had a height ranging between 0.3 and 0.4m. Maximum seafloor gradients recorded at the wellsite were identified as 1.7 degrees. The quantitative assessment of recent surveys identified four dominant benthic communities consisting of Annelida, Mollusca, Arthropoda and Echinodermata. Across the regions seven individual instances of the reef building worm *Sabellaria spinulosa* have been recorded, none of which are in close proximity to the proposed works. No other examples of protected species or habitats have been identified within the vicinity of the well. Epifauna communities within the area is dominated by the common brittlestar (Ophiothrix fragilis) and Actiniaria (Sea anemone).

The fishing effort in the area (ICES 36E6) is rated low. The proposed operations coincide with fish spawning and/or nursery activity for several species. Of the species identified as using the area a spawning ground or nursery area, those that are sensitive to disturbance from oil and gas related activities include Angler fish, Nephrops, Plaice, Sandeel, Sole and Whiting. Harbour porpoise, bottlenose dolphin and white beaked dolphin have all been recorded in the vicinity of the Lennox well. Harbour porpoise and white-beaked dolphin may be present in low densities and bottlenose dolphin in low to moderate densities during the operational period. Common seal and the grey seal are resident in the Irish Sea although densities vary over the year. Harbour and grey seals are known to forage within 60km and 40km of their haul out sites respectively. Given the location of the well approximately 7km off the English coastline is likely that grey and harbour seals to be present in the operational area. Seabird vulnerability is extremely high from October to March and high or medium for the remaining part of the operational period. Sensitivity in the surrounding blocks is also extremely high during the months of October to March.

There is no available shipping density data for block 110/15 specifically. Additional information from surrounding blocks indicates a range in shipping density ranging from very high to low and is predominantly shipping and passenger vessels. The project location is within the North West Inshore Marine Plan Area. The Irish Sea has moderate levels of oil, gas and offshore wind developments, with few developments in the region of the operational site. The project area is not located within or near any military practice and exercise areas (PEXA), nor are there any Ministry of Defence (MoD) related restraints on Block 110/15. There are no aggregate dredging or sites of archaeological interest or aquaculture sites within 40 km of the operations. The nearest telecommunication cable is identified as being 2 km northeast of the drilling location. The closest active windfarm is Burbo Bank located approximately 15km south of the well location.

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 on the environment from the activities associated with the project were assessed, including impacts arising from atmospheric emissions from vessel use, seabed disturbance, physical presence from the MODU/vessels, planned discharges to sea from chemical use, drilling discharges and accidental events such as an oil spill. 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 *Valaris Norway* MODU has the potential to cause interference to other users of the sea, namely fishermen and vessel traffic, however the rig and support vessels will be located within a 500m safety zone. Its presence within the safety zone means only authorised vessels would be allowed within the 500 m radius of the MODU, therefore excluding other users of the sea. All appropriate notifications to mariners will be made prior to the drilling activities commencing. There are no navigational concerns in relation to the proposed location, and no objections were received from the navigational consultees. Given the low importance of the fishing area and the low vessel traffic, and that the drilling project is a temporary activity the impact is deemed insignificant. An emergency response and rescue vessel will be on site continually to monitor for vessel traffic and provide alerts to other users of the sea.

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 area of estimated area of impact resulting from the contingent rig stabilisation material is 0.0018km2. Based on proxy cuttings discharge modelling, deposition of cuttings is expected to have a permanent impact area of 0.00018 km2 due to change to seabed sediment composition. The area of temporary impact due to the MODU anchor system is 0.017km2. The areas of impact are small in comparison to the surrounding area of similar habitat and no significant impact is expected at a population level. Recovery by recolonisation is expected to start following the cessation of drill cuttings deposition and removal of the anchor system.

As a worst case, the total area of the seabed likely to be impacted by the operations is estimated to be 0.018km2. The Liverpool Bay SPA covers an area of 2528 km2 and it is therefore anticipated that the seabed impact from the operation is likely to be restricted to approximately <0.000007% of the total Liverpool Bay SPA. Lennox well 110/15-8 is located within the Liverpool Bay SPA and there is the potential for aggregations of wintering red-throated diver, common scoter and little gull to be present within the operational area. Although there is the potential for the operations to temporarily disturb, prevent or reduce access to foraging seabirds in the Liverpool Bay SPA boundary within an area maximum of 50 km2, given that the SPA area covers an area of 2,528km2 which supports 1% or more of the British populations of red-throated diver, common scoter, little gull, common tern and little tern, the scope of the work is localised and for a short period of time and the impacts to seabirds deemed to be tolerable. No evidence of any potential Annex I Habitats have been found in the vicinity.

Atmospheric emissions will arise from the use of the *Valaris Noway* jack-up rig and other associated vessels, Atmospheric emissions, when comparedwith total UK

figures, are considered to present a relatively small contribution.Furthermore, the temporary nature of the emissions along with the offshoregeographic location and winds within the offshore environment, means that theatmospheric emissions will be rapidly dispersed and are not likely to be detectablewithin a short distance from the shore. Therefore, while atmospheric emissions willmake a cumulatively contribution to global climate change, they are not considered topresent a significant effect on the environment.

The impacts of drilling discharges on water quality and benthic fauna is predicted to be minimal as affects will be localised and short-lived. Moreover, given that recovery of the seabed and the associated benthic communities is likely to begin once drilling has been completed, the environmental impact of the discharged cuttings, within the impacted area, can be considered insignificant.

The cetacean density for Bottlenose dolphin, White-beaked dolphin and harbour porpoise (Annex II species) during the operational period, is low and the proposed operations are unlikely to have a significant impact on these species. Whilst harbour seals and grey seals (Annex II species) may be present in the vicinity of the well the proposed operations are unlikely to have a significant impact on these species. Prey associated with the diets of harbour porpoise are also unlikely to be significantly impacted by the operations.

There are no expected transboundary effects from the operations due to the localised and temporary nature of the disturbance and the 140 km distance from the UK / Ireland Median Line.

Although not a planned activity, a well blow out and an unplanned release of diesel from a vessel was assessed. The developer has mitigation and control measures in place to prevent such. The proposed operations carried out as planned are not likely to have a significant effect on the environment and the probability of an unplanned release from the proposed operations is low. There is no aggregate dredging, military practice sites, sites of marine archaeological interests or aquaculture sites within the vicinity of the proposed operations. The operations are in accordance with the North West Inshore Marine Plan's objectives and policies.

It is considered that the drilling of the Lennox 110/15-8 intersection well is not likely to have a significant impact on other offshore activities or other users of the sea and no cumulative impacts are expected to occur.

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:

N/A