

Our Ref: 01.01.01.01-5303U
UKOP Doc Ref:1331182



Offshore Petroleum Regulator
for Environment & Decommissioning

REPSOL RESOURCES UK LIMITED
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Registered No.: 00825828

Date: 8th March 2024

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**

CLAYMORE FIELD, WELL: 14/19- C90 - sidetrack to C58 CAS

I refer to your amended application dated 30th January 2024, reference DR/2295/3 (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

Signature valid

Digitally signed by Department for Energy Security
and Net Zero
Date: 2024.03.08 17:35:38 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**

CLAYMORE FIELD, WELL: 14/19- C90 - sidetrack to C58 CAS

DR/2295/3 (Version 1)

Whereas REPSOL RESOURCES UK LIMITED has made an application dated 30th January 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 applications ref: WONS/14575, 15268/0/GS/1 V1, 15270/0/GS/1 V1, WONS/15276/1/S/1 and WONS/15125/1/C/1 Version 1

Effective Date: 8th March 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 25 September 2022 until 31 July 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:

DR/2295/3 (V1) - 8 March 2024

The Department held a meeting on 24th January 2024 to discuss the MEI assessment associated with this application. A programme of variations will be agreed with the Department to address the changes proposed at the meeting.

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 assessment 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 has 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 amendment screening direction (ref: DR/2295/3) relates to the completion of the well and handing over to production.

DR/2295/2, DR/2995/1 and DR/2995/0 - relates to the initial drilling of the well.

Having regard, in the 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 Change to the Project (DR/2295/3):

- Remove cap and install blow out preventer ;
- Remove mechanical bridge plugs;
- Clean-up well with seawater and displace to base oil;
- Production packer set in the 7" liner;
- Plugs in the upper and lower completion
- Install Xmas tree
- Perforation offline and flow to Claymore A platform production;
- In the event of high H₂S and CO₂ content, bullhead the well, cement plug above the production packer to abandon the reservoir and suspend the well.
- No well testing will take place;

Summary of the Project

DR/2295/2 and DR/2995/1 - relates to the initial drilling of the well as follows:



- Drilling Claymore field development well: 14/19 (CAS).
 - Abandon C58 donor well with cement plug.
 - Directionally drill side track above plug in 13-3/8" casing.
 - Drill three sections: 12.25", 8.5" and 6" using low toxicity oil-based mud (LTOBM).
 - Run and cement 9-5/8" casing and 7" liner.
 - If low pressure oil in CAS well, contingency to run ST9 side track - abandon CAS above 7" liner, drill 8.5" & 6" side track and run 7" and 4.5" liner.
 - If no oil in CAS well, contingency to run C9A side track - abandon CAS above 7" liner, drill 8.5" & 6" side track and run 7" and 4.5" liner.
 - Otherwise run and cement 4.25" production liner for CAS well.
 - Run lower completion and production packer.
 - Suspend well and attach xmas tree.
 - Perforate and produce.
- OGA (NSTA) consent application ref: WONS/14575 CAS well
OGA (NSTA) consent application ref: WONS/15268/0/GS/1 V1 ST9 side track
OGA (NSTA) consent application ref: WONS/15270/0/GS/1 V1 C9A side track

Description of the Project

Projects DR/2295/2, DR/2995/1 and DR/2995/0 consisted of the drilling of the platform development well 14/19a-CAS in the Claymore field (OGA consent application ref: WONS/14575 from the Claymore Alpha platform's drilling rig. The CAS well is a single well targeting oil from donor well C58. The well will be produced at the Claymore platform. The well was drilled and suspended in April 2023.

Project DR/2295/3 consists of re-entering the well, cleaning up the well and flowing the well to production. There will be no well test involving flaring. In the event of high H₂S or CO₂ being encountered then the well will be bullheaded and a cement plug placed above the production packer to abandon the reservoir and suspend the well. The operation has been extended from 31 April to 31st July 2024.

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

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

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.

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: -



Well 14/19-C58 platform well is located approximately 130 km from the Scottish coastline and 102km west of the UK/ Norwegian median line. Water depth at the drilling location is 111 metres.

Winds predominate from the south, south-west and west ranging from 8 to 8.5m/s in summer to 12.5 to 13m/s in winter. The mean spring tidal range is between 0.25 and 0.5m and mean significant wave height 1.55 to 2.32m. The central North Sea (CNS) has weak surface currents with regional deeper current speeds of 0.1m/s and residual currents of 0.05 to 0.1 m/s.

Predictive seabed mapping indicates a low energy deep circalittoral mud, sandy mud and muddy sand to be present. Survey results near Claymore consist of fine sediment with variability in sand content aligning with EUNIS classification 'deep circalittoral mud' and the field is on the north western edge of the Witch Ground Basin, muddy beds associated with pockmarks.

The benthic community associated with these sediments are dominated by polychaete worms and bivalve molluscs. Surveys confirm the presence of sea pens, sea anemones, crustaceans (Norwegian lobster) tubes, shrimp, crab, ling and anthozoans indicative of circalittoral fine mud communities and offshore circalittoral mixed sediments. Seapen and faunal burrows were observed from previous surveys confirming the biotope 'seapens and burrowing megafauna in circalittoral mud' to be present nearby.

There is no evidence of any Annex I habitats as shallow depressions surveyed showed no evidence of methane derived authigenic carbonate and the nearest Special Area of Conservation (SAC) designated for pockmarks is the Scanner Pockmark 72km south east. The nearest Nature Conservation Marine Protected Area (NC MPA), Central Fladen NC MPA is designated for 'burrowed mud' (seapens and burrowing megafauna and tall seapen components and 'sub glacial tunnel valley' 43 km away. While not found near the platform, juvenile Ocean quahog, also OSPAR listed as threatened or declining and a PMF was found during nearby surveys and therefore potentially present. Seapen and faunal burrows were observed. There is the potential for the OSPAR listed 'seapen and burrowing megafauna communities' habitat to be present as well as the broad scale PMF habitat 'offshore deep-sea muds', 'offshore subtidal sands and gravels' and 'burrowed mud'.

The proposed operations coincide with spawning periods for lemon sole, sprat, Norway pout, sandeel whiting and cod (consistently returns to selected spawning areas) with sandeel spawning on sandy substrate and not as likely at Claymore. Shellfish include Nephrops (Norwegian lobster) limited to muddy sediment with burrows observed. Several nursery species are present including anglerfish, blue whiting, cod, European hake, haddock, herring, ling, mackerel, Norway pout, Nephrops, sandeel, sprat, spotted ray, spurdog and whiting. Priority marine feature (PMF) species spawning/ nursery include whiting, cod, Norway pout, blue whiting, ling, anglerfish, sandeels, herring, mackerel and spurdog (spiny dogfish).



Seabirds observed at the well location include northern fulmar, Manx shearwater, European storm petrel, northern gannet, Arctic/ great skua, black legged kittiwake, great black backed/ common, lesser black backed and herring gull, Arctic tern, common guillemot, razorbill, little auk and Atlantic puffin. Long term decline in some seabird species has been observed. Seabird sensitivity to accidental spill is low to very high for the proposed drilling period in this location however it is 130km from shore.

Fin/ minke/ killer whales and bottlenose/ common/ white-beaked/ Atlantic white sided and Risso's dolphin have been sighted along with harbour porpoise. All cetaceans are 'species of national importance' (European protected species - Annex IV of the habitats directive and PMF). Harbour porpoise and bottlenose dolphin are Annex II listed. Sightings are low to very high for the proposed project period. Grey and harbour seals (Annex II listed and PMF) are unlikely in significant numbers 130 km from shore. Seal density offshore at Claymore is low.

The claymore field is in the National Marine Plan Area for Scotland. The CAS well is in International Council for the Exploration of the Seas (ICES) rectangle 45E9, an area targeted by trawl gears with most fish landed in September and the highest value and landings were shellfish compared to surrounding areas. Effort has fluctuated but overall fallen in the past five years but is low in a UK context. Pelagic and shellfish are less abundant and low in a UK context. Shellfish water protected areas and mariculture sites are located across coasts of Orkney and Shetland and northeast Scotland.

Shipping levels are low. There are no military restrictions. The drilling is being done from Claymore platform in an existing 500m safety zone with the nearest oil and gas development 19km away. There are no marine cables, renewable energy, marine aggregates or wrecks.

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 change to 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 change to 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.

During the drilling of the well (DR/2499/0, DR/2499/1 & DR/2495/0) discharge of chemicals used to recover the slot and drill the well including drill fluids, cementing, completion and well clean-up operations were assessed and are not considered to have a likely significant environmental impact. WBM was used for upper section displacing to LTOBM in the final section. LTOBM mud and cuttings were skipped and shipped rather than recovered for re-use. Discharges of cement at the seabed were also minor and residual volume from cleaning out mixing units after use, chemicals



risk assessed with no likely significant environmental impact.

The current project involves fluids from cleaning the well and running the completions consist of filtered inhibited seawater containing residual base oil (LTOBM) and reservoir hydrocarbon. Initial fluids include clean up chemical and visibly oily LTOBM and reservoir hydrocarbon will be contained, skipped and shipped. Visibly clean LTOBM will be discharged along with flush fluids where reservoir hydrocarbon concentration is 30ppm or less and there will be no change as a result of adding a side track. Discharges have been assessed and are not considered to have a likely significant effect on the environment.

The closest marine protected area is 43 km from the project. Impacts from discharges on the potential for PMF and OSPAR listed habitat and associated benthic fauna will be localised. Recovery over a short time is expected due to dispersion, dilution, photo and biodegradation and oxidation. Although the proposed project coincides with fish spawning and nursery species, discharge is from the platform, localised and will recover over a short period. It can be concluded that the project and the change to the project will not have a significant effect on seabed habitat, benthic or fish species.

Operations covered by the change to the project will coincide with low to very high seabird sensitivity for Block 14/19. The project is not considered to have a significant impact on seabirds.

A range of whale and dolphin species have been sighted in block 14 with a high density of white beaked dolphin and harbour porpoise during part of the proposed drilling period. Other species may be present but not observed. All cetaceans are species of national importance, Annex IV European protected species and harbour porpoise is also Annex II listed under the Habitats Directive. Given the natural avoidance behaviour of cetaceans, it is not expected that these species would be significantly impacted by the change to the project.

There will be no impact upon other users of the sea, the change to the project is being undertaken from the Claymore platform in a statutory 500m safety exclusion zone. The safety zone excludes unauthorised access by vessels and prohibits access to fishing vessels.

There are no expected transboundary effects from the change to the project. The nearest boundary (UK/Norway Median Line) is located approximately 102 km away. It is not considered likely that any planned discharge will be detectable at this distance from the drilling site.

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 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.



Atmospheric emissions are unlikely to increase significantly from the Claymore Alpha platform from the change to the project. It can therefore be concluded that any impacts from emissions from the project are not considered to be significant.

The drilling operations or the change to the project do not contradict any of the Scottish Marine Plan objectives and policies. It is considered that the change to the project and the drilling of the well is not likely to have a significant impact with other offshore activities or other users of the sea and no cumulative impacts are expected to occur.

Decision

Taking the above considerations into account, the Secretary of State has concluded that the project and the change to 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:

N/A