

Our Ref: 01.01.01.01-5799U
UKOP Doc Ref:1333522



Offshore Petroleum Regulator
for Environment & Decommissioning

BP EXPLORATION OPERATING COMPANY LIMITED
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Registered No.: 00305943

Date: 25th March 2024

Department for Energy Security &
Net Zero

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Crimon Place
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Dear Sir / Madam

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

SCHIEHALLION, Drilling of WI well204/20a- IX215

I refer to your amended application dated 25th March 2024, reference DR/2410/3 (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



**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**

SCHIEHALLION, Drilling of WI well204/20a- IX215

DR/2410/3 (Version 1)

Whereas BP EXPLORATION OPERATING COMPANY LIMITED has made an application dated 25th March 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/15658/0/PIDA/1, WONS/16048/0/IDA/1 and WONS/16048/0/C/1

Effective Date: 25th 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 12 October 2023 until 30 June 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.

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

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:-

DR/2410/0 - CAN-ductor installation at 204/20a-IX215 injector well (hereafter referred to as IX215) as outlined in the application and WONS reference WONS/15658/0/PIDA/1

DR/2410/1 - Inclusion of temporary workbaskets, DP beacons and guidepost ontop of CAN-ductors.

DR/2410/2 - relates to the drilling and completion of the IX215 well following the installation of the CAN-ductors under an earlier approval.

DR/2410/3 - this is for date extension only no changes to the project or impacts



Summary of the Change to the Project

This post direction amendment is for the drilling of the IX215 water injector well including 26", 17.5", 12.25" and 8.5" sections

Summary of the Project

- CAN-ductor installation at well IX215 (WONS/15658/0/PIDA/1);
- Drilling of the 26" section with seawater sweeps and Water based mud (WBM);
- Drilling of the 17.5" section with WBM;
- Drilling of the 12.25" section using low toxicity oil based mud (LTOBM);
- Drilling of the 8.5" section using low toxicity oil based mud (LTOBM);
- Well clean up and completion (all under WONS/16048/0/IDA and WONS/16048/0/C).

Description of the Project

The previous screening directions (DR/2410/0 and DR/2410/1) related to the installation, by suction piling into the seabed, of the CAN-Ductor system at the IX215 well location. This infrastructure was pre-installed for future drilling of the well and was completed in Q4 2023.

This screening direction (DR/2410/2) relates to the drilling of the IX2015 water injector well from the Ocean Great White semi-submersible mobile offshore drilling unit (MODU). The well will be drilled using seawater sweeps, WBM and LTOBM with sweeps discharged at the seabed, WBM and cuttings discharged at the surface from the MODU and the LTOBM and cuttings skipped and shipped to shore for disposal. 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. The well will be suspended post completion with the downhole safety valve and level 4 valves closed. The wellhead will be installed by the Ocean Great White rig and the Xmas tree will be installed at a later date. Drilling operations are expected to take 61 days.

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.

IX215 is part of the phase A+ campaign which includes 2 other wells to be drilled and



Can-Ductors to be installed (IX9302 and WP02RD applied for under DRA/1018 and DRA1019). In addition there has been 4 wells drilled in the phase A stage within the wider Alligin, Schiehallion and Loyal field in 2023.

The cumulative atmospheric impacts of phase A, phase A+ and subsea tie in and commissioning equate approximately 0.249% of the total atmospheric emissions associated with UK offshore activities in a year. The overall seabed impact from the drilling activities at PX25, PX104, PX204, PX423, IX215, IX9302, IX1410 and subsea tie in works is 0.1949 km². The cumulative impacts of these operations are not considered to be significant with a impact area of 0.0037% on the Faroe Shetland Sponge Belt NCMPS.

It is not considered to be likely that the project will be affected by natural disasters. 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 proposed project is located in the Schiehallion field, West of Shetland (WoS), in UKCS Block 204/20a approximately 130 kilometers (km) to the west of the Scottish coastline, and 36km to the east of the UK-Faroes median line, in a depth of approximately 400 metres (m).

The area in the vicinity of Alligin, Schiehallion and Loyal infrastructure is characterised under the European Nature Information System (EUNIS) protocol as Atlantic slope mixed sediment which falls under the deep-sea mixed substrata habitat. The superficial sediments in the wider region comprise of coarse sand with variable contributions of shells, gravels, cobbles and small boulders with a mean particle size of 0.9mm. This layer overlies soft brown clay deposits.

The mean significant wave height is expected to be between 2.7-3m. Currents in the area are predominately north-easterly and mean current speeds are normally in the region of 0.1-0.2ms⁻¹.

The fauna observed across the survey area are regularly observed within the North East Atlantic area. The worksite lies within the Faroe-Shetland Sponge Belt NCMPS. One of the designated features of this site is the OSPAR defined habitat; 'deep sea sponge aggregations'. The classification of whether the density of sponges constitutes a 'deep sea sponge aggregation' is considered by Det Norske Veritas (DNV, 2013) as dependant on whether each survey image has a greater than 10% coverage of sponges. The JNCC method of determination uses three criteria; Density, Habitat and Ecological function (2014).

Surveys were conducted in 2021 in the Schiehallion and Loyal field which identified



that sponges were identified at all stations apart from two. The closest station (SN) to the proposed IX215 well (i.e., <1 km) was the only station to show little of no porifera coverage. Further surveys in 2023 within the vicinity of IX215 were assessed utilising the JNCC criteria and the overall results show relative patchiness of the sponge aggregations across the area. Small areas consistent with the OSPAR definition for Deep sea sponge aggregations were identified in transects of ML2 (26m), ML3 (10m), ML4 (30m) and ML5 (9m), all samples taken in the vicinity of the proposed operations exhibited a sponge density of <10% suggesting deep sea sponge aggregations are rare in the vicinity of the proposed operations.

No Ocean quahog were observed during site survey work with the closest known aggregation located 5km west from IX215. No areas of stony reef, fluid seep areas or other habitats of conservation significance were recorded in the survey area.

Bottlenose dolphins, harbour porpoise and white beaked dolphins were observed, in low densities in the WoS area. Seabird vulnerability in Block 204/20 is medium in June, very high in November and low for the remaining months. Similar sensitivities are observed in adjacent blocks.

The proposed operations will coincide with fish spawning and/or nursery activity for a number of species including as Atlantic mackerel, blue whiting, sandeels and Norway Pout.

There are a number of different seabed users which are active in the region. There are no known submarine telecommunication cables within 10km of the Schiehallion field. No aggregate dredging and disposal sites, planned offshore renewable energy developments or recreational sailing routes have been identified within 40km of the operation. Shipping density in the area is low. There are four global wreck and obstruction points within 10 km of the proposed IX215 well, with the closest being located 1.2 km southeast of the proposed well site. There are no Historic Marine Protected Areas (HMPA) within Block 204/20. The project is in the National Marine Plan Area for Scotland.

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 project is located within the existing 500m safety exclusion zones of the Alligin and Schiehallion field excluding unauthorised access of vessels and prohibiting access to fishing vessels.

Disturbance to the seabed could result in direct physical impact to benthic habitats and species within the immediate footprint of the operations. The project will result in a seabed footprint of 24,388 m² these primarily arose from the discharge of drill cuttings and the anchor chains from the MODU. Individual sponges are likely to be present in the vicinity however, within the area to be impacted by the drill cuttings, evidence from the site specific surveys and from the JNCC assessment indicate that sponges do not occur at a density considered to represent the OSPAR threatened and/or declining Species and Habitats 'deep-sea sponge aggregations'. However some stations along the anchor chain corridors could meet the criteria for sponge aggregations and are likely to be impacted by the placement of the anchor chains within a 2m corridor.

The proposed operations are located within the Faroe-Shetland Sponge Belt NCMPA. This site is designated for deep-sea sponge aggregations, offshore subtidal sands and gravels, ocean quahog, continental slope, channels and iceberg plough-marks and sand waves. The overall size of the protected site is 5,278 km². As the proposed operations will impact an estimated 0.025 km² of the seabed, it is expected that < 0.00048% of the protected site will be impacted.

The cumulative impact of the operations is considered not significant as this operation represents a small increase in the total area of anthropogenic disturbance to the NCMPA. Given the extent of habitat disturbance at Schiehallion in relation to the size of the NCMPA and the distance between the Schiehallion and other activities, it is not expected that this will have a significant cumulative impact on the integrity of the designated features or the conservation objectives of the NCMPA.

Fish, marine mammals and benthic species (which may be PMFs, Annex II species and EPSs) are not considered to be significantly impacted. This includes noise impacts to marine mammals, as drilling and vessel noise is deemed below levels which present a significant risk.

Drill cuttings modelling has been conducted and concluded that the discharge of the drill cuttings is not expected to result in a significant adverse impact to the marine environment.

Discharge of offshore chemicals associated with the drilling of the well have been assessed as not likely to have a significant effect on the environment. Offshore chemicals associated with LTOBM will be skipped and shipped.

Atmospheric emissions from the MODU and vessels during the drilling operations are expected to be short lived and likely to be negligible relative to the total emissions associated with shipping. These are expected to rapidly disperse and are not likely to have a significant impact. There are no expected transboundary effects from the project. The nearest boundary (Faroes median line) is located approximately



28 km east of the operations.

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 very low noting that this is a water injector well. 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

The project is in accordance with the National Marine Plan for Scotland's objectives and policies. It is considered that the drilling of the IX215 well is not likely to have a significant impact on other offshore activities.

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