

Our Ref: 01.01.01.01-5552U
UKOP Doc Ref:1340691



Offshore Petroleum Regulator
for Environment & Decommissioning

BP EXPLORATION OPERATING COMPANY LIMITED
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Registered No.: 00305943

Date: 3rd May 2024

Department for Energy Security &
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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**

**CLAIR, Clair Phase 1 Platform, DRILLING PRODUCER WELL A26
206/08a-AS1U5P2 planned well**

I refer to your amended application dated 22nd April 2024, reference DR/2358/6 (Version 2).

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**

**CLAIR, Clair Phase 1 Platform, DRILLING PRODUCER WELL A26
206/08a-AS1U5P2 planned well**

DR/2358/6 (Version 2)

Whereas BP EXPLORATION OPERATING COMPANY LIMITED has made an application dated 22nd April 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/14459/0/IDA/ and WONS/15610/0/S/1 and WONS_SCON/5166

Effective Date: 3rd May 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 6 April 2023 until 30 May 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/2358/6 3rd May 2024

The Department note the end date of the direction has been brought forward as the well is now suspended.

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



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 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 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

This variation DR/2358/6 is to reflect that the well is now suspended and the end date of the drilling direction has been brought forward to the 30th of May 2024 to reflect that no further drilling operations are due to take place at this time.

The variation DR/2358/5 is to reflect the side track will occur at or above the 18 5/8" casing due to a restriction found. The casing will be cut and pulled at the bottom of the conductor. The well will be sidetracked from the cut point.

This variation DR/2358/4 is for date extension only due to delays. There are no changes to the assessment.



The variation DR/2358/3 is for the date extension and the repeat of mechanical side track for the well starting below the 18 5/8" casing shoe. It also includes a further contingency of another mechanical sidetrack either from 13-3/8" or 9-5/8" casing string. The top sections (32" and 22" have been drilled and the well is currently suspended)

The variation DR/2358/2 is in relation to suspension of the well during Clair shut down and turnaround (TAR)

The variation DR/2358/1 is in relation to the inclusion of a mechanical side track below the conductor shoe.

The following assessment record has been amended to reflect that the well is suspended.

Summary of the Project

The well has been suspended for diagnostics to be completed for the 18-5/8" section.

Drilling of 32" section with Water Based Mud (WBM) and seawater and sweeps.

Drilling of 22" section with WBM

The well was suspended during the Clair TAR

Cut 18 5/8" casing and pull at the bottom of the conductor

Re-mechanical side track from the cut location/above the 18 5/8" section using WBM

Drilling of 16" section with water based mud (WBM)

Drilling of 12.25" section using Low Toxicity Oil based mud (LTOBM)

Drilling of 8.5" section using LTOBM

Mechanical side track contingency of sidetrack options from 13-3/8" or 9-5/8" casing string

Well Clean up and Completion.

Description of project

This project covers the drilling of development well 206/08-A26, now renamed 206/08-A26-Y from the Clair Platform. The well is now suspended prior to the lower sections being completed or the reservoir accessed.

The well was spudded and the top two sections drilled, however the 18 5/8"



casing has become stuck and therefore a mechanical side is required in order to complete the well. The well is now long term suspended until further decision is made by the operator.

The well was to be drilled with a combination of Seawater and sweeps and WBM and LTOBM. The 32" and 22" sections were drilled with WBM and cuttings were discharged to sea with the 32" discharged at seabed and the 22" section from a cuttings caisson exiting the platform approximately 43m below the sea surface. This was then suspended during the Clair TAR and due to issues encountered. The well was planned to be re-entered and the 18 5/8" casing cut and pull at the bottom of the conductor. Re-mechanical side track from the cut location/above the 18 5/8" section using WBM. The 16" section was to be drilled with WBM and cuttings discharged from the caisson. Cuttings generated in the LTOBM sections were skipped and shipped. The well has been suspended.

No cumulative impacts are expected to occur between this project and other existing projects due to the distance between them.

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 Clair Phase 1 platform is located approximately 54 kilometres (km) west of Shetland and 93 km south east of the United Kingdom-Faroes median line.

The project is in an area characterised by sand, slightly gravelly sand and gravelly sand with a water depth of 141 metres (m). The wave height within the area ranges from 2.71 - 3.00 m and the annual mean wave power is between 42.10 - 48.00 kW/m. Surveys indicated that areas were predominately classified as sublittoral coarse sediment. Additional habitats were identified to a lesser extent, including sublittoral sand and sublittoral mixed sediment. The benthic fauna in the vicinity of the Clair platform is typical of the wider area. Surveys conducted around the area observed a diverse range of species.

Sediments within the survey area were identified as comprising the broad scale Priority Marine Feature (PMF) habitat 'offshore subtidal sands and gravels', however, this habitat is widely distributed and unlikely to be of conservation significance for the wider survey area. This is the preferred habitat for ocean quahog *Arctica islandica*,



however no adult *A. islandica* were observed across both survey areas and siphons were not visible at the sediment surface in any of the seabed photographs. Due to the areas of relatively high reflectivity observed throughout both survey areas, it was thought that the Annex I habitat 'stony reef' was likely to occur. However, after assessment these areas did not meet the minimum extents and therefore were not considered to constitute an Annex I stony reef habitat. Other protected features such as, but not limited to, PMF Ocean quahog *Arctica islandica*, OSPAR Threatened and/or Declining Species of 'Seapen and Burrowing Megafauna' and deepsea sponge aggregations were not identified from either the geophysical or photographic data.

The closest protected site to the project is the Faroe-Shetland Sponge Belt Nature Conservation Marine Protected Area (NCMPA) located approximately 21 km to the northwest and the Seas off Foula Special Protected Area (SPA) located approximately 34 km to the southeast.

The project is in the National Marine Plan Area for Scotland. The proposed operations will coincide with fish spawning and/or nursery activity for a number of species. Numerous cetacean species are present in the area in low numbers with the exception of white-beaked dolphin and harbour porpoise, which are present in moderate and high numbers respectively during the operational period. Low numbers of Grey, harbour and hooded seals are anticipated to be in the area at any time. Seabird sensitivity during the operational period ranges from low to high. Fishing effort in the area is low.

There is only one oil and gas installation within 40km of the project. There are no submarine cables within the vicinity. The area is located within a Ministry of Defence practice area but any restrictions are only applicable to the siting of an installation. Shipping density in the area is low. There are no protected wrecks located in the vicinity. No aggregate dredging and disposal sites, sites of marine archaeological interest, aquaculture sites or planned offshore renewable energy developments have been identified within 40km of the Clair Platform.

Given the location of the project, it is not likely that the areas identified at paragraphs 2(c)(i), (iii), (iv), (vi), (vii) and (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, seabed disturbance, physical presence, planned discharges, accidental events and transboundary impacts.

Other than the matters considered further below, there is not likely to be any significant impact of the project on population and human health.



There is a 500 m radius safety zone around the Clair Platform, excluding unauthorised access of vessels and prohibiting access to fishing vessels. There are therefore not expected to be any impacts to other sea users.

Operations are conducted from the Clair Platform and will use existing power generation. It is expected the emissions will be rapidly dispersed and are not likely to have a significant impact.

There was some seabed disturbance from the discharge of water-based mud drill cuttings prior to the suspension of the well. This could result in the smothering and mortality of benthic fauna which will result in some short term temporary impacts however the benthic communities are expected to regenerate the area impacted by drill cuttings over time. The impacts from seabed disturbance have been assessed as not likely to have significant effect.

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. Offshore chemicals associated with LTOBM will be skipped and shipped.

Transboundary effects from the project are expected to be negligible. The nearest boundary line (UK/Faroes Median Line) is located approximately 93 km north west 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 low. 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 drilling operations do not contradict any of the Scottish marine plan objectives and policies.

No cumulative impacts are expected to occur.

2) 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.

3) 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:

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N/A