

Our Ref: 01.01.01.01-6039U  
UKOP Doc Ref:1344369



Offshore Petroleum Regulator  
for Environment & Decommissioning

REPSOL RESOURCES UK LIMITED  
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Registered No.: 00825828

Date: 28th May 2024

Department for Energy Security &  
Net Zero

AB1 Building  
Crimon Place  
Aberdeen  
AB10 1BJ

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Fax

[www.gov.uk/desnz](http://www.gov.uk/desnz)  
[OPRED@energysecurity.gov.uk](mailto:OPRED@energysecurity.gov.uk)

Dear Sir / Madam

**THE OFFSHORE OIL AND GAS EXPLORATION, PRODUCTION, UNLOADING  
AND STORAGE (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS  
2020  
CLAYMORE CFC, WELL 14/19-C80**

A screening direction for the project detailed in your application, reference DR/2455/0 (Version 2), dated 8th May 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 Therese Follin Harcombe on +44(0)1224 254030 or email the Environmental Management Team at [OPRED@energysecurity.gov.uk](mailto: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**

**CLAYMORE CFC, WELL 14/19-C80**

**DR/2455/0 (Version 2)**

Whereas REPSOL RESOURCES UK LIMITED has made an application dated 8th May 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/16282/0/GS/1 V2.

Effective Date: 28th 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 1 June 2024 until 31 December 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](mailto: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/2455/0 v2- 28 May 2024**

A cement trial has been included in this permit, CP/3089/0 and CP/2906/0 as a contingency measure. This is due to uncertainty over the order of operations and on the understanding that only a single cement trial may be required on either this permit, CP/3089/0 or CP/2906/0. Please note that the Department only permit a single cement trial on either this permit, CP/3089/0 or CP/2906/0. If a cement trial is performed on this permit, CP/3089/0 and CP/2906/0 must be varied to remove the requirement for the cement trial.

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**

### **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**

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 Project**

- Drilling of Claymore CFC well (sidetrack from the donor 14/19-C80 platform well)
- Slot recovery using a Water Based Mud (WBM) system
- Drilling of 8 1/2" section (reduction to 6" for some of its length if required) using a Low Toxicity Oil Based Mud (LTOBM)
- Testing of the Cement unit if not already completed under CP/3089/0 or CP/2906/0.
- Cementing of the well
- Well bore clean-out operation.

OGA (NSTA) consent application ref: WONS/16282/0/GS/1 V2

### **Description of the Project**

This project involves drilling a side track to the existing 14/19-C80 well from the





Claymore platform. No MODU will be utilised and there is an existing surface 500m safety zone and a dedicated ERRV in operation.

It is estimated that the project will take up to 95 days between June 2024 and end of December 2024 to account for operational delays. The side track will be drilled as a 8 " section with a contingency to reduce some of the length to 6" inch dependent on the stability of the wellbore. Clean-up fluid returns to the platform will be discharged to sea if within oil in water specification. No significant cumulative impacts are expected to occur with any other existing or approved projects. The risk of a major accidents and environmental effects from major accidents, 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. It should be noted that the well is drilled as a water injection well.

There is not likely to be any significant impact of the project on population and human health. It is not considered likely that the project will be affected by natural disasters. No nuisances are foreseen from the project. There is one synthetic oil waste streams resulting from the project which will be discharged to sea and will quickly disperse in the offshore waters and the minor base oil content would be rapidly broken down through the natural biodegradation process.

### **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 project is in an offshore oil and gas licenced area, approximately 130 km east from the Aberdeen coastline in Scotland and 102 km west of the UK/Norway median line, in an area where water depth is approximately 111 m, and the seabed type is broadly characterised as offshore circalittoral mud. Water circulation in the project location is driven by the influx of North Atlantic waters through the Fair Isle Channel moving southwards along the Scottish coast. Within the region, the mean significant wave height is 2.32 m.

The project location is not within any protected areas, with the closest UK area, the Central Fladen Nature Conservation Marine Protected Area (ncMPA), designated for the protection of features such as burrowed mud (sea pens and burrowing megafauna and tall sea pen components) and sub-glacial tunnel valley representative of the Fladen Deep. This ncMPA is approximately located 43 km away.

The epifauna observed in the survey area were dominated by dominated by polychaetes.

The project works and timing will take place at a time when a number of fish species may be found to use the area as spawning, juvenile or nursery locations. Sightings of cetaceans are most common in the months of May and December. Seals are not



expected to be seen at the remote location. Seabirds are most common in the area during the months of May and June. The project area is used for fishing, but will occur from an existing platform with a 500m safety zone hence is not expecting to impact fishing industry. The surrounding area comprises other oil and gas infrastructure, with the closest development within 19 km. The closest renewable energy project is located ca 23 km from the platform and is not expected to be impacted. There are no Marine aggregates licences nor any wrecks that are scheduled monuments or Historic Marine Protected Area within 40 km of the platform.

Given the location of the project, the areas identified at paragraphs 2(c)(i), (iii), (iv), (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 operation will occur from Claymore platform that has been in situ since 1976 and is surrounded by a 500 m safety zone for which vessels are not allowed to enter hence it would not be expected that shipping in the area would be significantly impacted by the drilling operations at the platform.

There is not expected to be significant seabed impact as the drilling operations are to be carried out from the Claymore platform and no additional drilling rig is required. The initial slot recovery at the well be undertaken using WBM which will be discharged overboard. The well section is to be drilled using LTOBM with all cuttings contained and therefore zero discharge to the seabed. Any discharge to sea following on from the operations are expected to disperse and biodegrade rapidly and are therefore not expected to have significant effect on the marine environment.

Offshore registered chemicals will be used and discharged during the drilling of the well. The use and discharge of the chemicals have been risk assessed and modelled in accordance with other regulatory requirements. The use and discharge modelling shows a low risk to the environment from the chemicals. Use and discharge of chemicals is not expected to have a significant impact on the environment.

Emissions to air will occur from combustion plant used on the platform and support vessels. The quantity of carbon dioxide equivalent from the drilling of this well and support vessel use amounts to 0.0042% of the 2022 total emissions from offshore oil and gas activity. The drilling and support vessel emissions will not have a detrimental effect to local air quality over the long-term, nor are they expected to inhibit the ability to reach wider climate change goals. 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 number of vessels used and vessel trips required to achieve the project deliverables) and hence minimising fuel use and avoiding the unnecessary operation of power generation / combustion equipment.

In the event that an unlikely and unplanned accidental spill scenario from a well blow-out was realised the volume of oil that would be released from well 14/19-C80 has been estimated at 48m<sup>3</sup>/day. Which would not expect to lead to a major environmental incident. All drilling activities will be carried out in accordance with the Offshore Safety Directive as per Repsol's Well Examination Scheme and Guidance Document. An approved Oil Pollution Emergency Plan to manage hydrocarbon releases will be in place prior to activities being undertaken.

There are no planned expected transboundary impacts because of the project.

## **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:

N/A