Our Ref: 01.01.01.01-5804U
UKOP Doc Ref:1351515

Offshore Petroleum Regulator
for Environment & Decommissioning

BP EXPLORATION OPERATING COMPANY LIMITED
CHERTSEY ROAD
SUNBURY ON THAMES
MIDDLESEX
TW16 7BP

Registered No.: 00305943

Date: 9th July 2024

Department for Energy Security &
Net Zero

AB1 Building
Crimon Place
Aberdeen
AB10 1BJ

Tel [redacted]
Fax

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
ALLIGIN,CAN-ductor Installation and drilling for INJECTOR WELL 204/20a-AIX9302 planned well

I refer to your amended application dated 8th July 2024, reference DR/2413/5 (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 Not Verified
Digitally signed by Department for Energy Security and Net Zero
Date: 2024.07.09 15:38:19 BST
Reason: On behalf of the Secretary of State
Location: Offshore Petroleum Regulator for Environment and Decommissioning

Our Ref: 01.01.01.01-5804U
UKOP Doc Ref:1351515

Offshore Petroleum Regulator
for Environment & 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

ALLIGIN,CAN-ductor Installation and drilling for INJECTOR WELL 204/20a-AIX9302 planned well

DR/2413/5 (Version 1)

Whereas BP EXPLORATION OPERATING COMPANY LIMITED has made an application dated 8th July 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/15659/0/PIDA/1, WONS/16075/0/IDA/1 and WONS/16075/0/C/1

Effective Date: 9th July 2024

Our Ref: 01.01.01.01-5804U
UKOP Doc Ref:1351515

Offshore Petroleum Regulator
for Environment & Decommissioning

Our Ref: 01.01.01.01-5804U
UKOP Doc Ref:1351515

Offshore Petroleum Regulator
for Environment & Decommissioning

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 31 March 2025.

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.

Our Ref: 01.01.01.01-5804U
UKOP Doc Ref:1351515

Offshore Petroleum Regulator
for Environment & Decommissioning

Our Ref: 01.01.01.01-5804U
UKOP Doc Ref:1351515

Offshore Petroleum Regulator
for Environment & Decommissioning

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

Our Ref: 01.01.01.01-5804U
UKOP Doc Ref:1351515

Offshore Petroleum Regulator
for Environment & Decommissioning

SCHEDULE OF SCREENING DIRECTION DECISION REASONS

The Secretary of State has decided that, based on the information provided, theproject is not likely to have a significant effect on the environment. The main reasonsfor this decision are:

1) Decision reasons

The following provides a summary of the assessment undertaken 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 the particular, to the matters identified at paragraphs 1(a) to (g) ofSchedule 5 to the Regulations, the characteristics of the project include thefollowing:-

DR/2413/0 : CAN-ductor installation at 204/20a-AIX9302 injector well (hereafter referred to as AX9302) as outlined in the application and WONS reference WONS/15659/0/PIDA/1

DR/2413/1 : Inclusion of seabed installation aids

DR/2413/2 : relates to the drilling and completion of the 204/20a-AIX9302 injector well (NSTA reference WONS/16075/0/IDA/1 Version 1 and WONS/16075/0/C/1). This follows the installation of the CAN-ductors under an earlier approval.

DR/2413/3 is for date extension only no changes to the project.

DR/2413/4 is to update to spud date and date extension, no changes to the project.

DR/2413/5 is to allow operational flexibility of the 26" well section being drilled whilst

the Ocean Great White is either on dynamic positioning or on anchors.

Summary of the changes to the project

This post direction amendment is for an update to include the option of the 26" section being drilled whilst to Ocean Great White is either on anchors or dynamic positioning. There are no changes to the assessment below as anchors has the greater impact which was already assessed.

Summary of the Project

- CAN-ductor installation at well IX9302 (WONS/15659/0/PIDA/1);

- Drilling of the 26" section with seawater sweeps and Water based mud

(WBM) Followed by the cementing of 20" casing;

- Drillling 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/16075/0/IDA/1 Version 1).

This application includes and assesses the environmental impacts of a contingency scenario where the full length of the well is re-drilled.

Description of the Project

The previous screening directions (DR/2413/0 and DR/2413/1) related to the installation, by suction piling into the seabed, of the CAN-Ductor system at the AIX9302 injector well location. This infrastructure was pre-installed for future drilling of the well and was completed in 2023.

This amendment to the screening direction (DR/2413/2) assess the drilling of the AIX9302 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. The sweeps, mud and cuttings from the 26" section will be discharged at the seabed. WBM and cuttings from the 17.5" section will be discharged at the sea surface from the MODU whilst the LTOBM and cuttings from the lower sections will be skipped and shipped to shore for disposal with no discharge to sea.

Once the well sections have been drilled, casings will be run, and cement will be used to provide integrity to 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 Xmas tree will be installed at a later date.

IX9302 is part of the phase A+ drilling campaign which includes 2 other wells incorporating similar Can-ductor installation and drilling operations (IX215 and PX1410 applied for under DRA/1017 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.Operations for AIX9302 are expected to take 72 days.

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) ofSchedule 5 to the Regulations, the environmental sensitivity of geographical areaslikely to be affected by the project has been considered as follows:-

The proposed project is located in the Alligin field, West of Shetland (WoS), in UKCS Block 204/20a approximately 138 kilometers (km) tothe west of the Scottish coastline, and 28km 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 variablecontributions of shells, gravels, cobbles and small boulders, this layer overlies soft brown clay deposits.

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

The fauna observed across the survey area are regularly observed within the NorthEast Atlantic area. The worksite lies within the Faroe-Shetland Sponge Belt NCMPA.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 constitutesa 'deep sea sponge aggregation' isconsidered by Det Norske Veritas (DNV, 2013) asdependant 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 sponges at all stations apart fromtwo. The closest station (REF 2) to the proposed AIX9302 well location (890m) showed between 5 - <10% porifera (sponge) coverage which did not meet the criteria of a 'deep sea sponge aggregation'. Further drop-down camera surveys were undertaken in 2023 along the mooring chain and anchors corridors, these were assessed utilising the JNCC criteria. The results from the 2023 survey did confirm the presence of sponges along the mooring lines and small areas of dense sponge along the chain corridor did potentially meet the criteria

of a 'deep sea sponge aggregation'. However, there was a high degree patchiness and variability in the distribution of sponges and the majority of the areas surveyed were not deemed to support the OSPAR defined habitat; 'deep sea sponge aggregations.

No Ocean quahog were observed during site survey work with the closest known aggregation located 7 km east from AIX9302. 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, inlow 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 anumber 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 Alligin field.

There are no aggregate dredging or disposal sites,planned offshore renewable energy developments or recreational sailing routes have been identified within 40 km of the operation. Shipping density in the area is low. There are ten global wreck and obstruction points within 10 km of the proposed IX9302 well, with the closest being located 2.2 km southwest of the proposed well site. There are no Historic Marine Protected Areas (HMPA) within Block 204/20.

The project is in the National MarinePlan Area for Scotland.

Given the location of the project, it is not likely that the areas identified at paragraphs2(c)(i), (iii), (iv), (vi), (vii) of Schedule 5 to the Regulations will be affected by theproject.

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 500 m safety exclusion zones of theAlligin field excluding unauthorised access of vessels and prohibiting access to fishing vessels.

The proposed operations will cause disturbance to the seabed whichcould result in direct physical impact to benthic habitatsand species within the immediate footprint of the operations. The main sources of this disturbance will be the installation of the Can-ductor (approximately 35.26 m2), the deposition of drill cuttings (approximately 500m2)onto the seabed and the placement of anchors and chain onto the seabed to secure the MODU (approximately 27600 m2). The anchors and chain will cause an abrasive disturbance to the seabed, whereas the drill cuttings will potentially create achange in sediment composition. The total area of potential seabed disturbance from the drilling operation,whenall sources are considered is 0.0281 km2.

Close to the drill site the survey data suggests individual sponges are likely to be found growing on the seabed in varying numbers. However, the data is not suggestive that the sponges will occur in high enough densities that they would reach the criteria of a sponge aggregation. It is these dense areasof sponge growth which represent the OSPAR threatened and/or declining habitat 'deep-sea sponge aggregations' feature, which the site is designated for. Furthermore, 3 other wells have previously been drilled within 145m of the AIX9302 meaning the area around the well has will already have been subject to varying levels of disturbance and seabed change.

The anchor chain will occupy a 2-metre-wide corridor within which some seabed abrasion could occur as the chain moves with the tide and weather. Detailed seabed imagery data was collected along these anchor and chain corridors, each of which are between 2600 - 2900 metres in length. Sponges were observed commonly growing along each mooring line and in small patches the sponge abundance and density did become sufficient to meet the criteria of a'sponge aggregation'.Possible sponge aggregations covered up to 27% of mooring line 5 (which had the greatest proportion), the other mooring lines had varying proportions from 25% to 1%. There is a risk therefore that sponge aggregations maybe affected by the placement of the chains and anchors on the seabed. The anchors and chains will be removed at the end of the drilling operationallowing recovery of any affected sponge habitat to occur.

The proposed operations are wholly 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 wave fields. The overall size of the protected site is 5,278 km2. As the proposed operations at AIX9302 will impact an estimated 0.028 km2 of the seabed, it is expected that < 0.00053% of the protected site will be impacted which is a very small proportion. Moreover, most of this impact is due to the placement of mooring chain from which full recovery of the habitat is expected. The impact of the drilling operations at AIX9302 will not cause a significant impact on the NCMPA.

The drilling of well AIX9302 is part of a wider campaign in block 204/20 that includes the drilling of 7 wells which will result in a cumulative seabed disturbance 0.2593km2. These works also overlap with the Faroe Shetland sponge belt NCMPA.The cumulative seabed impact of this campaign equates to 0.0049% of the NCMPA. The

spatial extent of these cumulative impacts is small in relation to the size of the NCMPA and will not be of a scale or severity to significantly affect the integrity of the designated features or the conservation objectives of the NCMPA.

A large range of seabirds have been observed in the area, the species composition and numbers of which vary throughout the year. The Seabird vulnerability in block 204/20 is low in October and December and very high in November. Adjacent blocks show similar vulnerability, also ranging from low to very high. The nearest SPA is the Seas off Foula SPA but the operation is not expected to impact the site.

Fish, marine mammals and benthic species (some of which are PMFs, Annex II speciesand EPS) are not considered to be significantly impacted. This includes a consideration of noiseimpacts to marine mammals, as drilling and vessel noise is deemed to be below levelswhich present a significant risk.

Drill cuttings modelling has been conducted with 1,320,923 kg discharged from the planned well and up to 2,641,84 6kg discharged under a contingency scenario. The cuttings will accumulate to around 2-4m close to the wellhead, reducing to no more than 0.1 m at 50 m. Outside of this immediate area, deposition is likely to be very light and hard to detect bathymetrically. The very localised accumulation of cuttings means 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 and cementing operations have been assessed and will be controlled by an associated chemical permit and thus are not likely to have a significant effect on the receiving environment. Offshore chemicals associated with LTOBM will be skipped and shipped to shore and thus will have no effect on the marine environment.

Greenhouse gas emissions will be emitted by the vessels involved in the project namely the Ocean Great White and the support vessels. These will total 8054.2 CO2e emissions, whilst all greenhouse gas emissions will affect the climate, the contribution made by these emissions will be negligible, for example it represents 0.038% of the total atmospheric emissions associated with UK offshore activities in a year when other greenhouse gases are also included. The cumulative atmospheric impacts of phase A, phase A+ and subsea tie in and commissioning equate approximately 0.25% of the total atmospheric emissions associated with UK offshore activities in a year.

The atmospheric emissions associated with the drilling of AIX-9302 may result in short-term deterioration of local air quality within the vicinity of the well location, however, in the exposed conditions that prevail offshore, these emissions are expected to disperse rapidly and are not considered to have a significant impact on any receptor.

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 AIX9302 well location is not likely to have a significant impact on other offshore activities or otherusers 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 is not likely to have a significant impact on the environment and thatan environmental impact assessment is not required.

2) Mitigation of significant effects

The following are features of the project or measures envisaged that the developerhas proposed to avoid or prevent what might otherwise have been significantadverse effects on the environment:

Not Applicable.