

Our Ref: 01.01.01.01-5991U
UKOP Doc Ref:1351977



Offshore Petroleum Regulator
for Environment & Decommissioning

CHRYSAOR PETROLEUM COMPANY U.K. LIMITED
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LONDON
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Registered No.: 00792712

Date: 11th July 2024

Department for Energy Security &
Net Zero

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Crimon Place
Aberdeen
AB10 1BJ

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Dear Sir / Madam

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

I refer to your amended application dated 26th June 2024, reference DR/2446/2 (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**

RB CHALK WELL

DR/2446/2 (Version 1)

Whereas CHRYSAOR PETROLEUM COMPANY U.K. LIMITED has made an application dated 26th June 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/16110/0/IDA/1 and WONS/16110/0/C/1.

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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 29 February 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

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:

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 +44(0)1224 254037



SCHEDULE OF SCREENING DIRECTION DECISION REASONS

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 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 project :

- Drilling of the RB Chalk 30/07a-RB well at the Judy Riser Platform (JRP) in the Judy field.
- 36" x 26" Section to be drilled with Water Based Mud (WBM), sea water and hi-viscosity sweeps.
- 16", 12.25" and 8.5" Sections to be drilled with Low Toxicity Oil-Based Mud (LTOBM).
- Contingency re-spud (36" x 26" section) and mechanical sidetrack.
- Well completion including stimulation of the 5.25" x 7" lower completion by proppant fracking.



- Wellbore clean-up via a temporary well test package on the drilling rig with a maximum flow period of 96 hours and a maximum of 975 tonnes of condensate and 1,025 tonnes of gas to be flared.
- Final hook-up and commissioning of the well via the Judy Platform.

Summary of the change to the project:

A change to the project was requested under application DR/2446/2 (version 1) to include:

- full details of the fracking campaign and associated chemical use and discharge associated with this. The assessment below has been reviewed, amended and remains valid.

Description of project

This project consists of the drilling of all four sections of the RB Chalk 30/07a-RB well to the target depth, followed by well completion and stimulation using proppant fracking. The RB Chalk 30/07a-RB well will be drilled as a development well and is expected to take 135 days to complete.

The 36" x 26" section will be drilled using WBM, with all mud and cuttings being discharged to the seabed.

The 16", 12.25" and 8.5" sections will use Low Toxicity Oil Based Mud (LTOBM) that will generate a maximum of 1,760,104 kg of drill cuttings entrained with LTOBM which includes all contingency options. For all LTOBM sections the cuttings and mud returns will be skipped and shipped to shore for disposal.

The stimulation will be carried out post cementing the lower (5.25" x 7") completion and will consist of 14 - 18 stimulation sleeves. The lower completion annulus isolation between frac sleeves / stages will comprise of cement. the lower completion will be proppant fracked using a work string to open a sleeve, pump the frac, reverse out any proppant within the lower completion and then close the sleeve before moving up the well to the next stage. After the last stimulated stage, the workstring will be pulled out of the hole. A 5.25" x 4.25" completion string will be installed, complete with a shearable centraliser to locate into (but not seal) the lower completion liner hanger packer Polished Bore Receptacle (PBR). In addition, a deep-set plug will be run in conjunction with a production packer to provide 'A' annulus isolation. The completion design includes a Permanent Downhole Gauge (PDHG) and a Down Hole Safety Valve (DHSV). The BOPs will be nipped down and the Xmas tree and wellhead valves installed.

The well requires to be cleaned-up through a temporary well test package on the rig to clean out all drilling and completion fluids. It is anticipated the well will require to be flowed for a maximum period of 96 hours to clean out any fluids in the production tubing. An estimated 2,000 tonnes (te) of hydrocarbons (975 te of condensate and



1,025 te gas) will be flared as part of the well clean-up.

A change to the project was also requested to discharge 7m³ / 11mt cement cuttings from the rig due to a washover / fishing operation at the Chalk 30/07a-RB well.

A further change to the project was requested for the discharge of fracking chemicals on the occurrence of abnormal operations for safety reasons.

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.

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.

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 Judy platform is in Block 30/07a in the Central North Sea (CNS) approximately 263 kilometres (km) from the Scottish coast of the UK and 13 km from the UK/Norway median line, in an approximate water depth of 76 metres (m). The area is referred to as the J-Area comprising the Jade, Jasmine, Joanne, Judy and Talbot developments.

Sediments in the Judy field are categorised as ' Offshore Deep Circalittoral Sand ' with the National Marine Plan interactive indicating the Priority Marine Feature (PMF) habitat 'Offshore Subtidal Sands and Gravel' occurs within the wider Judy field. Surveys in the area have shown local sediments to consist of silty fine to medium sand with shell fragments.

The benthic assemblage identified from site surveys undertaken in the J-area indicate a community typical of the sediments identified. Observed macrofauna included polychaete annelids (bristle worms), arthropods (including shrimps and crabs), molluscs (including bivalves and snails), echinoderms (including star fish and brittle stars).

Surveys of the Talbot area to the south identified the presence of horse mussel at all stations, along with bacterial mats. The biogenic reefs formed by horse mussel are listed under Annex I of the Habitats Directive and is classified as a threatened and/ or declining habitat. However, the criteria for positive identification of the biogenic reef were not fulfilled for the Talbot survey area. No other potential Annex I habitats have been identified in the J-area.



The closest area protected for Annex I habitat is the Dogger Bank Special Area of Conservation (SAC) and the Southern North Sea SAC. These are located over 100 km to the south of the J- Area. The J-area development partly overlaps the Fulmar Marine Conservation Area (MCZ) designated for protection of broad-scale habitats of subtidal mud, subtidal sand and subtidal mixed sediments, as well as the protection of ocean quahog. The Judy platform, which is the focus of this application, is located 10 km North of the Fulmar MCZ.

The PMF species Ocean quahog, which is also on the OSPAR List of Threatened and/or Declining Species, were identified during site surveys of the J-area in low densities, although there are no recordings of Ocean Quahog within Block 30/07 in the National Marine Plan interactive.

Seabird vulnerability for Block 30/07 is low year-round. Adjacent blocks show sensitivities for short periods ranging from medium to very high, but overall are considered low. Block 30/08 shows extremely high vulnerability in May and June.

Atlantic white-sided dolphin, Common dolphin, Harbour porpoise, Minke whale and White beaked dolphin have been observed in the area between the months of May and November. Common dolphin has been observed in low densities in the area whereas the other species identified have been observed in moderate to high densities. Grey and harbour seals are not frequently sighted within the area with individual densities of both ranging from 0-1 individuals per 25 km².

The Judy field lies within International Council of the Sea (ICES) rectangle 42F2. The area is a spawning and nursery ground for several species throughout the year. Many of the species identified are Scottish Priority Marine Features.

Fishing effort in ICES rectangle 42F2 for 2021 and 2022 was disclosive. However, the data for 2020 indicated the ICES rectangle 42F2 was primarily targeted for shellfish species. This area contributed to 0.003% of UK landings and 0.003% of value in 2020 when compared to overall UKCS fishing.

The Judy platform is not located within a Ministry of Defence (MoD) training range.

The closest submarine cables are the Judy-Culzean cable and the TAMPNET Clyde-Judy cable, located approximately 1 km southwest of the Judy platform.

There is one non-dangerous wreck situated approximately 2 km southwest of the RB Chalk well location. There are a further eleven non-dangerous wrecks present within 20 km from RB Chalk well, including the Devotion located approximately 12 km to the northeast.

There are no shellfish water protected areas or active aquaculture sites in the vicinity of the Judy field. The closest active aquaculture sites are located on the Aberdeen coast >250 km to the west of the Judy field.



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 physical presence, seabed disturbance, atmospheric emissions, planned discharges and accidental spills. There is not likely to be any significant impact of the project on population and human health.

The RB Chalk (30/07a-RB) development well will be drilled using the Valaris 120 jack-up rig stationed at the JRP and will operate within the platforms 500 m exclusion zone. The navigational control measures are contained within the Consent to Locate which has been approved for the location of the Valaris 120 jack-up rig.

There will be localised impact on benthic fauna from the physical siting of the rig and from the discharge of cuttings. Low densities of ocean quahog were recorded during the surveys in the vicinity of the Judy field however due to the localised impact of the proposed operations, a significant impact is not anticipated on the population of the species.

Most sightings of bottlenose dolphins and harbour porpoise (which are Annex II species) occur between May and November at moderate density and the proposed operations are unlikely to have a significant impact on these species. Due to the distance of the RB Chalk Well from shore (263 km), harbour and grey seals (Annex II species and PMFs), are not likely to be encountered regularly or in great numbers in the area of the well.

The wellbore clean-up operations may result in the discharge of wastewater containing residual base oil from the LTOBM. The WBM and cuttings will be discharged to the seabed while the LTOBM drill cuttings will be skipped and shipped to shore for disposal. The discharge of WBM has been assessed and is not considered to have a likely significant effect on the environment.

The discharge of chemicals used to drill the well, including cementing, wellbore clean up, and completion chemicals have been assessed and are not considered likely to have a significant impact on the marine environment.

The discharge of cement cuttings from the washover / fishing operation as described in the change to the project has been assessed and is determined to represent the Best Practicable Environmental Option (BPEO) and is not considered to have a significant impact on the environment.

Atmospheric emissions are expected to be temporary in nature and will be emitted from the combustion plant on the drilling rig, supporting vessels, four flights per week to/from the drilling rig for personnel. Atmospheric emissions have been assessed



from the fuel usage for each vessel and the time spent on location, as well as from flaring, which results from the well clean-up/test. The total atmospheric emissions (as CO₂e), for undertaking the proposed operations is approximately 18,310.16 tonnes and accounts for 0.0862% of the total atmospheric emissions associated with the UK offshore activities in a year (using 2021 as a baseline). Atmospheric emissions are expected to be rapidly dispersed in the open offshore environment in the direction of the prevailing wind. The impact has not been assessed as significant.

There are no expected transboundary effects from the drilling of the RB Chalk South 30/07a-RB well due to the localised and temporary nature of the disturbance and the 13 km distance from the UK/Norway Median Line, which is the nearest boundary. It is not considered likely that any planned operational discharge will be detectable at this distance from the well location.

A worst-case major accident scenario resulting from a potential well blow-out was modelled and assessed. The Developer has mitigation and control measures in place to prevent loss of well control and minimise the risk of an oil spill which could have a significant impact. The proposed operations carried out as planned are not likely to have a significant effect on the environment and the probability of a large oil spill from the proposed operations is low.

There is no operational renewable energy site, nor any under construction and there are no known wrecks of historical importance or military activity within the vicinity of the proposed operations. The drilling operations are in accordance with the National Marine Plan for Scotland's objectives and policies. It is considered that the drilling of the RB Chalk 30/07a-RB Well is not likely to have a significant impact on 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 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