

Our Ref: 01.08.06.15/566C
UKOP Doc Ref:1357584



Offshore Petroleum Regulator
for Environment & Decommissioning

CENTRICA ENERGY STORAGE LIMITED
WOODLAND HOUSE
WOODLAND PARK
HESSLE
HU13 0FA

Registered No.: 03294124

Date: 19th August 2024

Department for Energy Security &
Net Zero

AB1 Building
Crimon Place
Aberdeen
AB10 1BJ

Tel [REDACTED]
Fax [REDACTED]

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
ROUGH Gas Storage Project**

I refer to your amended application dated 19th August 2024, reference PR/2285/3 (Version 3).

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 valid

Digitally signed by Department for Energy
Security and Net Zero
Date: 2024.08.19 11:56:17 BST
Reason: On behalf of the Secretary of State
Location: Offshore Petroleum Regulator for
Environment and 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**

ROUGH Gas Storage Project

PR/2285/3 (Version 3)

Whereas CENTRICA ENERGY STORAGE LIMITED has made an application dated 19th August 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 Rough 48/3B gas storage project as detailed in the application.

Effective Date: 19th August 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

This screening direction shall be valid from 26 August 2022.

2 Gas Unloading and Storage

The holder of the direction shall ensure that the level(s) of gas injection and storage do not exceed the level(s) detailed in the application for the direction, and in the application for consent relating to the approval.

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, using the appropriate Environmental Emissions Monitoring System (EEMS) reporting forms.

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 [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, 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

PR/2285/3 (Version 3)

Application amended to extend the duration of the gas storage consent to the 30th of April 2025. No physical changes have been undertaken at the storage site offshore. Therefore, no change in environmental impacts is expected from what has already been described.

PR/2285/2 (Version 2)

Application amended to increase storage capacity from 35 billion standard cubic metres of gas to 39 billion standard cubic metres of gas. This increase in storage capacity is the result of onshore modifications. No physical changes have been undertaken at the storage site offshore. Therefore, no change in environmental impacts is expected from what has already been described.

Revised expected minimum / maximum injection and production rates for Phase one, without any adjustment factors applied, are as expected to be as follows:

Injection 50 to 450 MMSCFD
Production 15 to 350 MMSCFD



PR/2285/1 (Version 1)

Application amended to update the applicant company name to Centrica Energy Storage Limited only.

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 :

Commencement of gas storage activities at the Rough field (Rough 47/3B installation).

Description of project

Phase 1 of the project involves using NTS pressure to inject gas into the Rough reservoir without using any compression on or offshore. The gas will be directly injected via the existing 36" sealine from the Easington Terminal into the reservoir using the 14 existing wells and involves the re-instatement of the existing installation infrastructure.

During Phase 1 of storage operations the level of cushion gas will gradually be built up to provide the required levels of gas supply. Phase 1 information is based on a storage cycle for the upcoming Winter 2022/ Summer 2023 period and the potential for a further cycle in Winter 2023/ Summer 2024 period in the event of issues or delays with proceeding to Phase two.

Expected minimum / maximum injection and production rates for Phase 1, without any adjustment factors applied, are as expected to be as follows:

Injection 50 to 230 MMSCFD

Production 15 to 220 MMSCFD

It is not considered to be likely that the project will be affected by natural disasters.

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 Rough 47/3B installation lies in a water depth of approximately 37m, 29 km northeast of Easington and 150 km west of the UK/Netherlands median line.



The area of Block 47/3b is typical of the offshore regions in the southern North Sea, where hydrographical, meteorological, geological, and biological characteristics are relatively constant over large areas.

Low relief seabed undulations, scour and megaripples are present in the vicinity of the Rough B Platform Complex. Seabed sediments are interpreted to comprise predominantly sand with numerous cobbles and boulders. There are also areas of disturbed seabed and potential debris. Numerous objects, predominantly interpreted through surveys of the area to represent boulders.

Indicator species in the southern North Sea area include the Polychaetes *Ophelia borealis* , *Nephtys longosetosa* , *Nephtys cirrosa* , *Aonides paucibranchiata* and *Pisione remota* ; Echinoderm, *Echinocardium cordatum* ; and Amphipoda, *Urothoe* sp. and *Phoxocephalus holbolli*. Characteristic epibenthic species of the southern North Sea include the sand-dwelling brittle star *Ophiura* , hermit crab *Pagurus bernhardus* , common star fish *Asterias reubens* and the flying crab *Liocarcinus holsatus* .

The polychaete worm *Sabellaria spinulosa* , which can form biogenic reefs, is known to occur in extensive patches in the southern North Sea. no *Sabellaria* reefs or *Modiolus* beds were observed during surveys of the area.

The Rough 47/3B installation is located within the Holderness Offshore Marine Conservation Zone (MCZ) which is designated for subtidal coarse sediment, subtidal sand, subtidal mixed sediments, ocean quahog (*Arctica islandica*) and features of geological interest. The project is also within 40km of the Holderness Inshore MCZ, Silver Pit, Wash Approach, Lincolnshire Belt and Compass Rose rMCZ's. The project is also located within the Southern North Sea (SNS) SAC which is designated for harbour porpoise.

Harbour porpoise, minke whales, bottlenose dolphins, white-beaked dolphins, white-sided dolphin and the long-finned pilot whale have been sighted in the vicinity of Quadrant 47 and surrounding Quadrants. Most of these sightings have been low and have occurred out with Quadrant 47 itself.

Block 47/3b lies within the spawning grounds for cod (January to April), herring (August to October), lemon sole (April to September), plaice (December to March), sandeels (November to February), sprat (May to August) and sole (March to May) and also lies in the nursery grounds for cod, whiting, plaice, sprat, lemon sole, mackerel, herring, sandeels and sole.

Seabird sensitivity in Block 47/3 ranges between low and very high across the year. The months of very high seabird sensitivity are February, March and June.

Block 47/3b lies within ICES rectangle 36F0. Fishing effort for 2020 was recorded as 2,543 days over the year. The highest effort was recorded in September (349 days). The fishing effort was dominated by traps.

There are no current marine aggregate extraction licences, military exercise areas or danger areas within 40 km of the project. In addition, there are no renewable energy activities in the immediate vicinity of the Rough field.

There are no offshore scheduled ancient monuments or protected wreck sites in the vicinity of the Rough field. There are historically significant shipwrecks within 40 km of the location but these are not immediately adjacent to the Rough field or the project location.

Existing oil and gas activity within the area is high; this region of the North Sea is highly developed with several fields nearby. The following fields are present within a 20 km radius: Tolmount, York, Eris, Artemis, Minerva, Mercury, Apollo, Ceres and Amethyst.

Shipping activity in the vicinity of the Rough field is considered to be 'High' to 'Very High'.

Given the location of the project, it is not likely that the areas identified at paragraphs 2(c)(i), (iii), (iv), (vi), (vii) or (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 of the gas storage project impacts on the environment were assessed. Other than the matters considered further below, there is not likely to be any significant impact of the project on population and human health.

Phase 1 of the gas storage project uses existing infrastructure and does not involve any modifications to the pipeline or Rough installation, including any increased chemical usage and therefore the project will not have any impact on the marine environment or other users of the sea.

With the production of native gas as the reservoir depletes, produced water will continue to be generated. The rate of produced water generated will remain relatively constant to the gas production rate and is not considered to have a significant impact on the marine environment.

As no new equipment will be installed during phase 1, there will be no changes to the atmospheric or hydrocarbon emissions output of the offshore platform.

There are no expected transboundary effects from the operations.

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.