

Our Ref: 01.01.01.01-6293U
UKOP Doc Ref:1357885



Offshore Petroleum Regulator
for Environment & Decommissioning

ITHACA ENERGY (UK) LIMITED
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Registered No.: SC272009

Date: 20th August 2024

Department for Energy Security &
Net Zero

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Dear Sir / Madam

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

CAPTAIN, Captain WPP'A', DRILLING PRODUCER WELL 13/22a-UM92P (C2Y)

A screening direction for the project detailed in your application, reference DR/2488/0 (Version 3), dated 2nd August 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 [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: 2024.08.20 12:03:13 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**

CAPTAIN, Captain WPP'A', DRILLING PRODUCER WELL 13/22a-UM92P (C2Y)

DR/2488/0 (Version 3)

Whereas ITHACA ENERGY (UK) LIMITED has made an application dated 2nd 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 project as detailed in the application, WONS/16769/0/GS/1.

Effective Date: 20th 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

The screening direction shall be valid from 20 August 2024 until 31 January 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.

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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 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:

Drilling of a new production well (UM92P), which will be drilled from the Captain Wellhead Protector Platform at Area A within the 500 m safety exclusion zone.

The UMP92P well will be drilled using Water Based Mud, with a discharge of cuttings and mud to the environment.

The existing C2y slot will be recovered to the 9-5/8" annulus and re-drilled to access the Upper Captain Sands. The new well will be in 1 section (8.5") Full slot recovery has been included as a contingency in case the 9-5/8" annulus isolation is inadequate, or the casing conditions are not suitable for sidetrack

Contingency sidetracks (12.25" and 8.5") have been included to represent the worst assessment case.

There will be no vertical seismic profiling or extended well tests carried out on the well with drilling and completion operations expected to last up to 119 days.

Description of the Project

The Captain development began production with the field tied back to a Floating, Production, Storage and Offloading Vessel (FPSO). There were 2 subsequent topside developments - a Bridge Linked platform which serves Area B and C drilling centres, and a Wellhead Protection Platform (WPP'A') which is a self-contained drilling rig position above Area A drill centre. Crude oil is exported from the FPSO via a shuttle tanker, and gas is exported and imported via the Frigg pipeline.

The proposed UM92P well will be drilled from the Captain Wellhead Protector Platform at Area A (WPP A) and is planned as an Upper Captain Sands (UCS) oil production well. The target will be drilled from slot 15 and will take the place of the C2Y production well, which is currently shut-in. The slot will be recovered with the well planned to kick off from the 9-5/8" casing. All the well sections will be drilled using Water Based Mud (WBM), with the mud and entrained drill cuttings discharged to the marine environment. Two contingency sidetracks have been included for the well to allow for a worst-case drilling scenario to be assessed. The well will be drilled within the already established 500m safety zone which surrounds the Captain WPP 'A' platform. Operations are expected to last up to a total of 119 days if the contingent sidetracks are drilled.

No cumulative impacts are expected to occur with any other existing or approved projects due to the selection of low bioaccumulation water-based muds, the proposed mitigation and the short duration of the project.

It is not considered to be likely that the project will be affected by natural disasters and 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 Captain field is located in the Outer Moray Firth area, approximately 190km west from the UK/Norwegian median line and 68km north of Aberdeen. Survey data shows the area to be indicative of a homogenous sediment mainly made up of sandy mud/muddy sand, which is classified as 'deep circalittoral mud'. Small, localised areas comprising sandy mud were also observed, with pebbles, cobbles and boulders, and are representative of 'deep circalittoral mixed sediments'.

Seabed scars were observed within the area, and are thought to be the result of trawl



scars, and relic anchoring activities and associated small pull out pits. Water depths across the area range from 96.5m in the west to 124.1m in the east of the area. Water depth at the proposed drilling location is 105m and the average wave height is 1.9m.

A survey of the area showed that epibenthic fauna was relatively sparse. The dominant epifauna were sea pens, with other species observed including Norway Lobster, starfish, brittle stars, polychaetes and gastropods. Sea pens were observed over the majority of the survey area, with densities ranging from occasional to frequent using the SACFOR scale, and burrow densities ranging from common to abundant. A SACFOR assessment concluded that the Captain area would be considered to represent the OSPAR habitat 'Sea pens and burrowing megafauna communities'. There was no evidence of ocean quahog in stills or video footage, however grab samples taken had evidence of ocean quahog shells.

Observations of areas of sand concluded that the area may fall broadly within the habitat 'subtidal sands and gravels', which is a priority habitat in the UK. Sandy mud interspersed with boulders and cobbles are indicative of 'stony reefs' however it was concluded that the area was to be 'low reef' and the Annex I 'stony reef' is not considered to be present.

Minke whale, white beaked dolphin, Atlantic white-sided dolphin and harbour porpoise have all been recorded in the vicinity of the Captain area. Densities of the species are categorised as very low with the exception of the white beaked dolphin which is low in February, July, September, October and December. Grey and harbour seals may be encountered, and density maps show the mean percentage of at sea populations of grey and harbour seals in the area of the Captain field as >0.01 to <0.025%, and <0.001% per 25km² respectively. It is unlikely that harbour seals frequent the area.

The Captain area is not situated within any conservation areas, with the nearest area of conservation interest being the Southern Trench NCOMPA which lies 45km to the south. This site is designated due to a variety of biodiversity and geological features including burrowed mud, sub-glacial tunnels and minke whale.

The Captain field lies within fishing designated ICES rectangle 45E8 and the proposed operations will coincide with fish spawning and/or nursery activity for a number of species. Fishing effort in the area is designated as of moderate importance, with demersal fishing dominating the species type. Fishing in the area accounted for 0.39% of the total UK value, and 0.25% of the total live weight landed for 2022. It is not anticipated that the drilling of well UC02P will have a significant impact on the fishing industry in the area.

Seabird oil sensitivity in the vicinity of the Captain field is extremely high in February, very high in December, high from April to June, and medium to low for the remaining months.

The closest wreck to the proposed drilling location is a non-dangerous Foul wreck



located 1.2km to the north of the Area B location. The closest wind farm is located 8km to the southwest, with 3 other windfarms proposed within 40km of the Captain field (17, 22 and 25km respectively - all at pre-planning stage). There is a carbon storage licence (CS003) located 15km to the southeast of the Captain field. There are no military restrictions within the block, and the nearest MoD practice and exercise area is located 7km to the west of the Area B location. The closest oil and gas installation is the Bleo Holm FPSO which is 27km to the southeast of the proposed location. Shipping density within the area is considered to be low. It is not anticipated that the proposed project will have a significant impact on either the wrecks, offshore wind area or the CCS project.

Given the location of the project, it is not likely that the areas identified at paragraphs 2(c)(i), (iii), (iv), (vi), (vii) of Schedule 5 to the Regulations will be affected by the change to 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 change to 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 from the change to the project on population and human health.

The proposed UM92P production well will be drilled from the Captain WPP A and therefore within the platforms existing 500 m safety exclusion zone, which excludes unauthorised access of vessels and prohibits access to fishing vessels. Fishing activities within the area are moderate, and shipping density is considered to be low. No additional impacts to other marine users are identified as part of the drilling of well UM92P. Therefore, there are no significant effects likely in terms of physical presence from the proposed project.

Cuttings from the WBM sections will be discharged at the seabed and into the water column. Cuttings dispersion modelling was undertaken for the cumulative effect of all four wells to be drilled as part of the current Captain platform drilling campaign, which includes well UM92P. The modelling assessment concluded that the cumulative effect of drilling the four wells shows a maximum cuttings pile thickness of 580mm which decreases to <1mm within 1000m of the wells.

Seabed disturbance from the deposit of WBM and cuttings to the water column could result in the smothering and mortality of benthic fauna which will result in some short-term temporary impacts. Ocean quahog are sensitive to increased siltation above 30 cm, and it is predicted that this smothering may cause mortality to some ocean quahog who are present in the area. The sea pen and burrowed mud habitats are also likely to be sensitive to smothering above 30cm. Burrowed mud habitats are also used by the Norway Lobster, which are considered likely to spawn within the vicinity of the UM92P well. It has however been shown that the Norway Lobster are

tolerant to smothering and have been assessed as not sensitive to an increase in suspended sediment. Given the small area of impact and the discharge of the WBM to the water column, there is the potential for mortality of individual ocean quahog if present in the area, and the potential to effect sea pens and burrowing megafauna. However, it is not expected to affect the population levels across the North Sea and it is expected that the benthic communities will regenerate in the area over time.

Noise generated from the project activities will not be significant, and it is concluded that the project is not expected to have a likely significant effect on the site in relation to harbour porpoise and the supporting habitats and prey.

There are no expected transboundary effects from the proposal to drill UM92P well. The nearest boundary (UK/Norwegian median) is located approximately 191 km from the proposed well location. It is not considered likely that any planned operational discharge (cuttings and chemicals) will be detectable at this distance from the well location.

The well to be drilled is a production well, and an assessment has been included within the project proposal to assess as a worst case, an uncontrolled well blow out from the Captain field, and the subsequent potential for a Major Environmental Incident (MEI). The assessment concluded that there is a potential for an MEI to occur, however the risk of an oil spill event as a result of a well blow out from well UM92P well is minimal, and the developer has suitable mitigation in place to prevent such an occurrence.

The proposed drilling operation is being undertaken at the Captain WPP 'A' platform, and will use existing power generation equipment. Atmospheric emissions are regulated under the platforms PPC and ETS Permits. It is not expected that the emissions due to the drilling of the well will have a significant impact on air quality. The developer has a set a target for their assets to reduce all scope 1 and 2 CO₂(e) emissions by 25% of 2019 levels by 2025 and is committed to the North Sea Transition Deal targets.

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:

N/A