Our Ref: 01.01.01.01-5736U
UKOP Doc Ref:1359919

Offshore Petroleum Regulator
for Environment & Decommissioning

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

Registered No.: 00305943

Date: 30th August 2024

Department for Energy Security &
Net Zero

AB1 Building
Crimon Place
Aberdeen
AB10 1BJ

Tel [redacted]
Fax

www.gov.uk/desnz
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Dear Sir / Madam

THE OFFSHORE OIL AND GAS EXPLORATION, PRODUCTION, UNLOADING AND STORAGE (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2020
GLEN LYON SUBSEA WORKSCOPE - PIPELINE PL6305

I refer to your amended application dated 30th August 2024, reference PL/2392/5 (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: 2024.08.30 15:09:17 BST
Reason: On behalf of the Secretary of State
Location: Offshore Petroleum Regulator for Environment and Decommissioning

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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

GLEN LYON SUBSEA WORKSCOPE - PIPELINE PL6305

PL/2392/5 (Version 3)

Whereas BP EXPLORATION OPERATING COMPANY LIMITED has made an application dated 30th 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, PA/4678, PA/4735, PA/4938, PA/5240 and PA/5241

Effective Date: 30th 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 25 August 2023 until 31 December 2024.

2 Commencement and completion of the project

The holder of the screening direction must confirm the dates of commencement and completion of the project covered by the screening direction. Notification should be sent by email to the Environmental Management Team Mailbox: opred@energysecurity.gov.uk

3 Nature of stabilisation or protection materials

Schiehallion West Stabilisation Material

Grout bags deposits

13.8 tonnes of grout contained within 25 kilogramme capacity bags. (The number of bags deposited should be the minimum required to provide the necessary protection, and any surplus bags must be returned to land).

Concrete mattress deposits

4 concrete mattresses, each measuring 6 metres x 3 metres x 30 centimetres. (The number of mattresses deposited should be the minimum required to provide the necessary protection, and any surplus mattresses must be returned to land).

Loyal Stabilisation Material

Grout bags deposits

6.8 tonnes of grout contained within 25 kilogramme capacity bags. (The number of bags deposited should be the minimum required to provide the necessary protection, and any surplus bags must be returned to land).

Concrete mattress deposits

24 concrete mattresses, each measuring 6 metres x 3 metres x 30 centimetres. (The

number of mattresses deposited should be the minimum required to provide the necessary protection, and any surplus mattresses must be returned to land).

Schiehallion North West Stabilisation Material

Grout bags deposits

6.4 tonnes of grout contained within 25 kilogramme capacity bags. (The number of bags deposited should be the minimum required to provide the necessary protection, and any surplus bags must be returned to land).

4 concrete mattresses, each measuring 6 metres x 3 metres x 30 centimetres. (The number of mattresses deposited should be the minimum required to provide the necessary protection, and any surplus mattresses must be returned to land).

Schiehallion Central Protection Materials

Bulk Bags

64 bulk bags each of 1 tonne. (The number of bags deposited should be the minimum required to provide the necessary protection, and any surplus bags must be returned to land).

Concrete Mattresses

56 concrete mattresses each measuring 6mx3mx0.3m (The number of mattresses deposited should be the minimum required to provide the necessary protection, and any surplus mattresses must be returned to land).

Grout Bags

1.5 tonnes of grout contained within 60 grout bags of 25 kg each. (The number of bags deposited should be the minimum required to provide the necessary protection, and any surplus bags must be returned to land).

4 Location of pipeline and stabilisation or protection materials

Within an area bounded by the coordinates as described in the SAT.

5 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.

6 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.

7 Monitoring

The results of any pre or post-placement surveys carried out to confirm the necessity for the deposits covered by the screening direction and/or to confirm the accurate positioning of the stabilisation or protection materials, should be forwarded to the Department following completion of the surveys

8 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.

9 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.

10 Deposit returns

The holder of the screening direction shall submit a report to the Department following completion of the deposit covered by the screening direction, confirming the quantity of materials deposited and the estimated area of impact, using the appropriate Environmental Emissions Monitoring System (EEMS) reporting form. Where no deposits are made, a 'nil' return is required.

11 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).

12 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 further 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

[redacted]

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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 the 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 change to the project

PL/2392/5
The change to the project is for the addition of protection materials on 3 flexible jumpers including the following:
i) Addition of permanent deposits of 22 concrete mattresses and 12 bulk bags on flexible jumpers PL1759 from F81 to M1C;
ii) Addition of permanent deposits of 22 concrete mattresses and 12 bulk bags on flexible jumper PL1760 from F82 to M1C;
iii) Addition of permanent deposits of 12 concrete mattresses and 40 bulk bags on PL3294 from M1C to M1J;
iv) Relocation by lift and shift of two fly to place's jumpers (FTP's) PLU/4625/UHJ-10367 and PLU4626/UHJ-10381 with contingency permanent deposits of up to 60 grout bags. Contingency minor movements of control jumpers to allow mattress placements

PL/2392/4 is for a slight increase in Fly to place (FTP)/hydaulic flying lead (HFL) basket and small dredging operations in order for the flowbase Retrievable Integrated Modular Stabplate (RIMS) connector on the FTP/HFL to be installed.

PL/2392/3 is for date extension only due to delays only.

Summary of the Project

i) The Installation of 2 production/gaslift bundle jumpers consisting of three lines- one jumper bundle at WP26 location and one jumper bundle at WP27.
ii) 4 electrical flying leads - two at WP26 location, two at WP27 location
iii) 2 Fly to place leads - one at WP26 location, one at WP27 location
iv) Permanent deposits equating to x552 25kg grout bags and 4 mattresses
v) Removal of disused jumper connecting M43 manifold to LP07 well to make space for the new infrastructure detailed below to be installed
vi) The installation of 3 production/gaslift jumpers laid as a bundle at the LP11 location
vii) 1 FTP controls jumper laid at LP11
viii) 2 electrical flying leads at LP11
ix) Permanent deposits up to 272 grout bags and 24 mattresses.
x) The installation of 2 production jumpers and a gas lift jumper from FP06 to FP05 in a bundle.
xi) Dredging around connection points in order for the flowbase Retrievable Integrated Modular Stabplate (RIMS) connector on the FTP/HFL to be installed.
xii) 1 Fly to place controls jumper and 2 Electrical Flying leads (EFL) jumpers (A and B) from CDA C121 to FP05.
xiii) Permanent deposits up 256 grout bags and 4 mattresses.
xiv) Associated temporary deposits for installation methods for all of the above works.

Description of the Project

The initial project involved the installation of new lines at WP26 well in Schiehallion West drill centre will consist of 150 m of 6"x6"x2" production/gaslift jumper bundle will connect the new WP26 well to the existing WP14 well (PL6309, PL6310 and PL6311). Two new electrical flying leads (EFL's) of 235 m each (PL6306 and PL6307 and a Fly to Place (FTP) control jumper of 215 m (PL6312). 25kg Grout bags and mattresses will be deployed for stabilisation material consisting of the following PL6306 - 96 grout bags, PL6307 - 96 grout bags, PLU6312 - 88 grout bags and 2 mattresses for PL6309.
The installation at WP27 will consist of 155 m of 6"x6"x2" production/gaslift jumper bundle will connect the new WP27 well to the existing WP13 well (PL6305, PL6316 and PL6313). Two new EFLs of 235 m each (PL6308 and PL6315 and a FTP control jumper of 200 m (PL6314). 25kg Grout bags and mattresses will be deployed for stabilisation material consisting of the following PL6308 - 96 grout bags, PL6315 - 96 grout bags, PL6314 - 80 grout bags and 2 mattresses for PL6305. All operations will occur within the existing drill centre 500 m zone and are included in the Pipeline Works Authorisation (PWA) PA/4678.

The lines will be wet stored in baskets prior to being surfaced laid on the seabed prior to grout bags and mattresses being used to stabilise the lines. Dredging around tie in locations maybe required however this will be small excavation and is considered as a worst case to require 12 m x 4 m at each tie in location. The Normand Subsea construction vessel will be utilised for operations with an estimated 23 days for completion for West drill centre. The Loyal drill centre operations covered under the previous post direction amendment involve the removal of a disused jumper and the

installation of two electrical flying leads (EFLs) from C38 to LP11 well, fly to place (FTP) control jumper from C38 to LP11, 6 x 6 x 2" jumper bundle from M43 to LP11, protective materials associated with the new infrastructure and temporary deposits to support the operations under PA/4735.
To facilitate the disconnection of existing infrastructure and the tie in of new infrastructure there may be the need for dredging (performed using an ROV). This dredging may be required at LP07, M43, LP11 and CDA C38. Additionally, further dredging may be required along the length of the existing jumper.

The Schiehallion North West drill centre operations involve small amount of dredging operations, the tieing in of well FP05 to the Glen Lyon FPSO production system via a new production/gas lift jumper bundle which will daisy chain to well FP06, 2 electrical flying leads (EFL) (A and B) and a Fly to Place (FTP) jumper will be installed between the Control distribution assembly (CDA)121 and well FP05. Protective materials associated with the new infrastructure and temporary deposits to support the operations under PA/4938.

The replacement of Schiehallion West WP26 and WP27 subsea control modules (SCM) will involve the temporary placement of equipment including a dead mans anchor on the seabed.

The change to the project at the Schiehallion central drill centre is to provide further protection on the infrastructure outboard from M1J manifold which is part of the WoSPS pipeline. The 3 flexible jumpers will be protected using concrete mattresses and bulk bags. Some minor movements of other fly to place jumpers and control jumpers may be required to allow the placement of the protection materials.

The temporary disturbance of the seabed from all the pipeline and associated activities is 11508 m2 with a permanent disturbance of 3197 m2. The cumulative impacts of drilling and tie-in activities in the Schiehallion, Loyal and Alligin fields and therefore the cumulative seabed impact from other activities in the area equate to a total disturbance of 227153m2 This equates to a total disturbance of 0.2772 km2.

There is no risk to human health from the works to install the pipelines or depositing the protective materials on the seabed. There is no credible potential for a major accident or disaster to affect this project.

Any wastes associated with the project will be handled appropriately and no significant impacts are anticipated. The project is not at risk from natural disasters given its location in UK offshore waters.

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 proposed project is located in the Schiehallion field, West of Shetland (WoS), in UKCS Block 204/25, approximately 129 kilometers (km) to the west of the Shetland

Islands, and 34.7km to the east of the UK-Faroes median line, in a depth of approximately 378 metres (m).

The area in the vicinity of Schiehallion and Loyal infrastructure is characterised as the European Nature Information System (EUNIS) habitat "Deep circalittoral mixed sediments (A5.45)". The sediments present across the Schiehallion area consist of coarse sand/gravel with an overlying layer of fine material with varying proportions of pebbles, cobbles, and shells, the seabed sediments appear poorly sorted and heterogenous in their composition, with a large variety in grain size. Site specific surveys identified the sediment types as subtidal sands, gravels, and muds, and as such are considered Priority Marine Features (PMFs).

The mean significant wave height in the area is 3.3m. Current speeds in the area are between 0.26 m s-1 and 0.5 m s-1 during spring peak flow, and during neap peak flow are between 0.11 m s-1 and 0.25 m s-1. The mean spring tidal range is between 2 m and 3 m. The fauna observed across the survey area are regularly observed within the North East Atlantic area.

The project and the changes to the project, lies within the Faroe-Shetland Sponge Belt NCMPA. Site surveys were conducted in 2014, 2017, 2021, 2023 and 2024. For the 2021 survey centre the closest site to the proposed operations was SW station located 0.6 km away and REF3 being 1.8 km away. Station SW recorded Cerianthus species and analysis did not identify any Porifera species as characterising the habitat. Furthermore, the characterising taxa of Station SW, as identified by SIMPER analysis identified that the station does not meet the Ecological Function criterion as the assemblage identified does not match that which is characteristic of a Deep-sea sponge aggregation. The 2021 imagery from the survey data showed a mean sponge cover of 0.25% for SW station and 0.42% for REF3 station. This coverage does not meet the requirements for the classification of Deep-sea sponge aggregations. The 2017 survey found that only one species - Haliclona sp. was present in localised densities of > 0.5m2 at two transects, south and southwest and therefore were recorded as "frequent" on the SACFOR scale. However, overall densities of sponges across the site did not meet this threshold and therefore, the West Schiehallion survey site was not considered to meet the "frequent" SACFOR threshold. The transects lie c. 190 m from the nearest disturbance caused by the operations at the West drill centre.

A further survey was conducted in February & May 2024 on the Schiehallion Central Drill centre CW-17ST and PX402 proposed mooring line routes, for the purposes of a sponge aggregation assessment. The location of CW-17ST & PX402 from the location of the central protection materials is around 108m. The mooring line assessments indicated potential sponge aggregations, with some areas on ML7 being classified as "abundant" in accordance with the SACFOR scale. The closest potential aggregation being 1.3km from the central protection materials. The Sponge assessment utilising the Henry & Roberts methods showed the area to have low to medium confidence that the feature can be considered a deep-sea sponge aggregation as defined by OSPAR.

A re-assessment of the of the 2021 survey was also undertaken for the sample stations SW, PC3 and SC, which are located c 3km, 1km and 400m respectively from the Schiehallion central drill centre for the purposes of a sponge aggregation assessment. Each sample station was low confidence that sample station can be considered a deep-sea sponge aggregation.

Only one adult Ocean Quahog shell was identified at any survey station. No juvenile individuals were found. No areas of fluid seep areas or other habitats of conservation significance were recorded in the survey area, although multiple patches which could be considered "areas of low rocky reef resemblance". However, no patch was greater than 25 m2 or met the other requirements which would mean that it could be classified as a stony Reef.

Minke whale, long finned pilot whale, white beaked dolphin, harbour porpoise, killer whales, sperm whales, fin whales, and Risso's dolphins occur in the area at low densities, with Atlantic white-sided dolphins occurring at low to moderate densities. Harbour and grey seals are unlikely to occur in the area.

Seabird vulnerability in Block 204/25 is generally low to medium throughout the year, with the exception of January and November when it is very high. Similar sensitivities are observed in adjacent blocks. The proposed operations will coincide with fish spawning and/or nursery activity for a number of species.

There are a number of different seabed users which are active in the region. The nearest marine cable is 14 km away. No aggregate dredging and disposal sites, sites of marine archaeological interests, planned offshore renewable energy developments or recreational sailing routes have been identified within 40km of the operation. There is one wreck located 3km from the project area. Fishing effort in the area is low.

Shipping density in the area is very low. The project is in the National Marine Plan Area for Scotland.

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 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.

There is a 500 m radius safety zone around the Loyal Drill Centre and Schiehallion central Drill Centre excluding unauthorised access of vessels and prohibiting access to fishing vessels. No additional impacts to fisheries are identified. No likely

significant effects in terms of physical presence from the project are expected.

Seabed disturbance will occur from the surface laying of jumpers, FTP and EFL's including potential dredging, temporary disturbance from installation equipment and the introduction of the protection materials. The disturbance of the seabed will result in the smothering and mortality of benthic fauna which will result in some short-term temporary impacts. None of the disturbance events are expected to cause significant impact to benthic receptors with a large area of similar seabed in the project area. The most risk is from direct impact resulting from the installation of infrastructure on the seabed with some smothering. It is expected that the benthic communities will regenerate in the area over time. The total area impacted from the direct operations will result in a temporary impact of 11508m2 with a permanent disturbance of 3197m2. The cumulative seabed impact of these operations plus the drilling operations would equate to a disturbance of 0.2772km2.

The area of permanent impact from the operations constitutes 0.00006 % of the Faroe-Shetland Sponge Belt NCMPA. The total cumulative disturbance of drilling and tie in operations equates to 0.0043% of the Faroe-Shetland Sponge Belt NCMPA. Given the extent of habitat disturbance at Schiehallion and Loyal in relation to the size of the NCMPA and the distance between Schiehallion/Loyal and other activities, it is not expected that this will have a significant cumulative impact on the integrity of the designated features or the conservation objectives of the NCMPA.

Fish, marine mammals and benthic species (which may be PMFs, Annex II species and EPSs) are not considered to be significantly impacted. Underwater noise from routine pipelay operations is considered to have a negligible impact on marine mammals and fish species as the majority of noise is of low frequency. There are no expected transboundary effects from the operations. The nearest boundary (Faroes median line) is located approximately 34.7km of the operations.

Discharge of offshore chemicals associated with the tie in operations have been assessed as not likely to have a significant effect on the environment. The main risk of accidental release of hydrocarbons is resulting from a loss of diesel inventory from a vessel. The assessment showed that the probability of a diesel spill from a vessel involved in the project is very low, with numerous mitigation measures and procedures in place. It is concluded that an accidental release of a hydrocarbon during the project is not considered to have the potential to cause a major environmental incident (MEI). Therefore, the risk of an oil spill event that could have a significant impact on the environment is minimised.

The proposed operation will utilise up to 2 vessels, and atmospheric emissions have been assessed from the diesel used for each vessel, and the time spent on location. The total atmospheric emissions from the vessels undertaking the project work, accounts for 0.019% of the total UKCS CO2 emissions (using 2018 as a baseline). The emissions may result in a deterioration of the local air quality, but due to the relatively short duration of the work, and that the exposed conditions in the area will rapidly disperse the emissions, it is not anticipated that there will be a significant impact.

The project is in accordance with the National Marine Plan for Scotland's objectives and policies.

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:

Not applicable