

Our Ref: 01.01.01.01-6290U
UKOP Doc Ref:1361365



Offshore Petroleum Regulator
for Environment & Decommissioning

BP EXPLORATION OPERATING COMPANY LIMITED
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MIDDLESEX
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Registered No.: 00305943

Date: 10th September 2024

Department for Energy Security &
Net Zero

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Crimon Place
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AB10 1BJ

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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**

Glen Lyon Sub-sea Phase A+ PIPELINE PL6491

A screening direction for the project detailed in your application, reference PL/2486/0 (Version 3), dated 27th 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: 2024.09.10 14:30:01 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**

Glen Lyon Sub-sea Phase A+ PIPELINE PL6491

PL/2486/0 (Version 3)

Whereas BP EXPLORATION OPERATING COMPANY LIMITED has made an application dated 27th 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/5143.

Effective Date: 10th September 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 10 September 2024 until 31 August 2025.

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

Grout bags deposits

6800 tonnes of grout contained within 25 kilogramme capacity non-biodegradable 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).

Grout Gabion deposits

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

4 Location of pipeline and stabilisation or protection materials

Within an area bounded by the coordinates:

60 22 18.41 North 04 11 35.01 West

AND



60 22 18.19 North 04 11 41.28 West

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 comments at this time.

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





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 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

Installation of 4 pipelines at the Alligin Drill Centre including:

- PL6491 water injection jumper, connected between AW11 & AW12; with stabilisation material deployed
- PLU6490 (Fly-to-place) FTP jumper; connected between AW11 & AW12; With stabilisation material deployed
- PLU6497 (Electrical Flying Lead) EFL jumper; connected between AW11 & AW12; with stabilisation material deployed.
- PLU6498 EFL Jumper connected between Well AW12 and UTAU102; with stabilisation material deployed
- Seabed disturbance by dredging at connection ends AW12, UTAU102 and AW11.
- The relocation of existing pipelines and protective materials to allow the installation of the new pipelines.

Description of the Project



This application relates to the installation of 4 pipelines at the Alligin Drill Centre. The Alligin field is produced through the Glen Lyon FPSO. The following pipelines are to be laid and connected between Wells AW11 & AW12:

- PL6491 a 115m long water injection jumper,
- PLU6490 a 140m long FTP Jumper
- PLU6497 a 165m long EFL Jumper

PLU6498, a 310m long EFL Jumper will be connected between Well AW12 and UTAU102.

There will be temporary disturbances associated with placement of equipment, temporary movement of other lines and associated protection until the installation is complete. PLU4594(90m long) will be disconnected and left in-situ. Dredging will be required at connection ends of AW12, UTAU102 and AW11. Permanent disturbances from deposits for stabilisation of the new lines. The activities will be undertaken using the Normand Subsea multi-purpose offshore vessel - no seabed disturbance is associated with the vessel. The tie-in work will be carried out using ROVs. The activities are expected to take 14 days.

All operations will occur within the Alligin drill centre 500m safety zone.

The temporary disturbance of the seabed from all the project is 3872m² and the permanent disturbance is 247m². The cumulative total disturbance of the project with other operations including drilling and sub-sea pipeline tie in activities for the Schiehallion, Loyal and Alligin Field phase A, phase A+, and the CANductors for Phase B wells, is 0.2772km².

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.

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) 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 Alligin field, West of Shetland (WoS), in UKCS Block 204/20, approximately 129 kilometres (km) to the west of the Scottish coastline, and 32 km to the east of the UK-Faroes median line, in a depth of approximately 473 metres (m).



The area in the vicinity of Alligin infrastructure is characterised under the European Nature Information System (EUNIS) protocol as Deep circalittoral mixed sediments (A5.45) or Deep-sea mixed sediment (A6.2) The superficial sediments in the wider region comprise 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 is expected to be up to 3m. Currents in the area are predominately north-easterly and mean current speeds are normally in the region of 0.1-0.2ms⁻¹ with a maximum of 2ms⁻¹ at the surface; and 0.05-0.1ms⁻¹ with a maximum speed of 0.3ms⁻¹ at the seabed.

The project lies within the Faroe-Shetland Sponge Belt NCMFA. Site specific surveys were carried out in 2013,2017,2021, 2023 and 2024 in February and May. The closest area of known deep sea sponge aggregations is >10km from Alligin Drill Centre. The closest survey station is REF2 which is <1.5km from the project site where the presence of sponges was identified. However, a re-assessment of the data collected at REF2 using the Henry & Roberts methods for identifying sponge aggregations, 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 further survey was conducted in February & May 2024 on the Alligin Drill centre for the PX402 well mooring line routes, for the purposes of a sponge aggregation assessment. The location of the mooring lines touch down points and the assessment area for PX402 from the location of the project (AW12) is around 1.3km southeast. The mooring line assessments indicated potential sponge aggregations, with some areas on Mooring Line7 being classified as "abundant" in accordance with the SACFOR scale. The closest potential aggregation being 1.8km from the project location. 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. Another designated feature of the NCMFA is ocean quahog (PMF). No Ocean quahog were observed during site survey work for the closet sample station REF2 and one adult was identified at Station DC1. No areas of stony reef, fluid seep areas or other habitats of conservation significance were recorded in the survey area.

The project is located in International Council for the Exploration of the Sea (ICES) Rectangle 49E5. This is within an area of spawning and nursery grounds of a number of species which are listed as Scottish Priority Marine Features (PMF's). However, the areas are transient, and the presence of juvenile fish is considered to be low.

Minke whale, long finned pilot whale, white beaked dolphin, harbour porpoise, and Risso's dolphins occur in the area at low densities, with Killer whale and 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 204/20 is low in October and December and very high in November. Similar sensitivities are observed in adjacent blocks.

There are a number of different seabed users which are active in the region. The nearest marine cable is 6 km away. No aggregate dredging and disposal sites, sites of marine archaeological interests, planned offshore renewable energy developments, aquaculture sites or recreational sailing routes have been identified within 40km of the operation. Shipping density in the area is 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.

The project will be carried out using the Normand Subsea Multipurpose Offshore Vessel within the 500m safety exclusion zone in place for the Alligin Drill Centre. Given that the project is located in an area considered to be of low importance to the UK fishing industry, is in an area which has very low shipping density, and the project is of short duration, any impacts on other sea users is not considered to be significant.

The temporary disturbance of the seabed from the project is 3872m² and the permanent disturbance is 247m². These seabed impacts will primarily arise from the placement of new pipelines and associated protection materials as well as the movement of current infrastructure to allow the work to be completed.

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. While the surveys indicated areas in the vicinity of the project where deep sea sponges were present, none of the surveys concluded that the areas could be classified as representing the OSPAR definition of deep-sea sponge aggregations.

The cumulative total disturbance of the project with other operations including drilling

and sub-sea pipeline tie in activities for the Schiehallion, Loyal and Alligin Field phase A, phase A+, and the CANductors for Phase B wells, is 0.2772km².

The area of permanent impact from the operations constitutes 0.000005% 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 the project location in relation to the size of the NCMPA 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.

Atmospheric emissions from the vessel during the drilling operations are expected to be short lived and likely to be negligible relative to the total emissions associated with shipping. These are expected to rapidly disperse and are not likely to have a significant impact.

There are no expected transboundary effects from the project. The nearest boundary (Faroes median line) is located approximately 32 km 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 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:

N/A