

Our Ref: 01.01.01.01-6316U
UKOP Doc Ref:1362236



Offshore Petroleum Regulator for
Environment & Decommissioning

DANA PETROLEUM (E&P) LIMITED
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Registered No.: 02294746

Date: 17th September 2024

Department for Energy Security &
Net Zero

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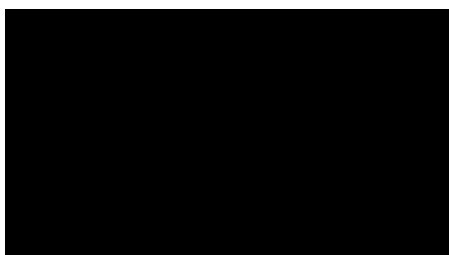
www.gov.uk/desnz
opred@energysecurity.gov.uk

Dear Sir / Madam

**THE OFFSHORE OIL AND GAS EXPLORATION, PRODUCTION, UNLOADING
AND STORAGE (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS
2020
GUILLEMOT NORTH WEST, COSLInnovator DRILLING PRODUCER WELL
21/24a- 21/24-PH (EC) planned well**

A screening direction for the project detailed in your application, reference DR/2493/0 (Version 3), dated 3rd September 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.





**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**

**GUILLEMOT NORTH WEST, COSLInnovator DRILLING PRODUCER WELL
21/24a- 21/24-PH (EC) planned well**

DR/2493/0 (Version 3)

Whereas DANA PETROLEUM (E&P) LIMITED has made an application dated 3rd September 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/16709/0/IDA/1 version 1 and WONS/16709/0/GS/1 Version 1.

Effective Date: 17th 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 16 September 2024 until 28 February 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:

DR/2493/0 (Version 3) 13th September 2024

By 27th September 2024 the application EAJ should be updated to clearly state in the Drilling Operations that the 8.5" and 9.5" well sections are to be drilled using a drill bit and under reamer.

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 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 Infill Well 21/24-EC (21/24-PH) production well from the anchored Semi-submersible mobile drilling unit (MODU) COSL Innovator;
- The 42", 36" and 26" sections will be drilled Water Based Mud (WBM) seawater and sweeps;
- Following the running and cementing of the 20" casing and housing, the blow-out preventer and riser will be connected;
- The 16", 12.25", sections will be drilled with Low Toxicity Oil Based Mud (LTOBM);
- The 12.25" pilot hole will be drilled and an abandonment cement plug set across the reservoir;
- A kick off cement plug will be set at the 13 3/8 shoe to allow the 12.25" main bore section to be drilled by directional drilling to the reservoir;
- The 8.5" x 9.5" section (under reamed) will be drilled with reservoir drill-in fluid Oil Based Mud (OBM);
- Cementing casings (with the exception of the 8.5" x 9.5" section);
- Wellbore clean-up after the lower completion to remove residual OBM;
- Run the upper completion;
- Temporarily suspend the well to recover the blow out preventer;
- Install vertical Xmas Tree;

- Xmas tree valves will be closed and tree cap installed prior to rig moving off location.
- No well clean up or test will be carried out;

Description of the Project

The well 21/24-EC is a new well to be drilled and completed in the Guillemot North West (GNW) Field. GNW is produced through the Triton Floating Production and Storage Installation (FPSO) along with a number of adjacent fields. The drilling of the production well will be from the MODU COSL Innovator semi-sub rig. The rig will be held on location by up to 8 anchors and 8 anchor chains, which will be pre-laid prior to rig arrival. The project will be supported by up to 2 anchor handling vessels (AHV), a guard vessel and supply vessels.

The well will be drilled riserless using WBM, seawater and sweeps for the upper 42", 36" and 26" sections. After the riser has been installed, the lower sections will be drilled; The 16" section then a 12.25" pilot hole with LTOBM. The 12.25" pilot hole to the GNW Eastern infill target is to inform reservoir properties which will then be abandoned back to the 13 3/8" shoe. The 12.25" main bore will then be drilled using LTOBM. The 8.5" sections will be drilled and the 9.5" section under-reamed at the same time with RDIF OBM. The WBM and cuttings will be discharged to the seabed and from the rig at the sea surface at the end of the section. The LTOBM / RDIF OBM and cuttings will be returned to the rig, and cuttings skipped and shipped to shore for disposal. The wellbore will be cleaned-up prior to running the upper completion. No well tests will be carried out requiring flaring.

The project will take place from the earliest 16th September 2024 until 28th February 2025, taking 83 days to complete.

No significant cumulative impacts are expected to occur with any other existing or approved projects.

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. No nuisances are foreseen from the project.

There are three synthetic oil-in-water waste streams resulting from the project which will be treated and analysed before discharge. Where specification for discharge can't be met, the waste will be returned to shore for treatment and disposal.

Location of the Project

Having regard 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 drilling project at the 21/24-EC well location is within the Central North Sea in the Guillemot North West (GNW) Field UKCS Block 21/24a approximately 154 km southeast from the Scottish coastline and 92km west of the UK/Norwegian median line. The water depth is approximately 87m. The 21/24-EC Well is part of the GNW field which has 5 horizontal production wells with only well W6y online. The GNW wells are tied to the Triton FPSO via drill centres 1 and 3. The project location is not within any protected areas, with the closest being the East of Gannet and Montrose NCMPA 5.4km to the north east; designated for the sandy and gravelly habitat which supports populations of the ocean quahog and also for a smaller area of deep-sea mud habitat.

Site-specific surveys identified the seabed as comprising of silty sand, fine sand, or silty clayey sand. The sediment type is described as fine or very fine sand and the broad scale benthic habitat across the project location has been classified as "Offshore circalittoral sand" European Nature Information System (EUNIS) habitat A5.27. Priority marine features were identified in the site-specific surveys in 2014 and 2022 with the closest stations to the project being ENV01.1 within 500m. Sea pens were recorded in photographs in the 2014 survey in low numbers. No burrows were recorded during these surveys. In addition, the sediments across the survey area do not correspond with the 'plains of fine mud' defined by OSPAR (2010) as the habitat for the threatened/declining feature sea pens and burrowing megafauna. Ocean Quahog juveniles and one adult were found as part of the 2014 survey. The 2014 and 2022 surveys did not find evidence that represents the presence of any Annex I habitats or communities. The surveys identified historical contamination of sediments in the form of historical oil based muds from drilling activities, but not adjacent to the project location.

The project works are located in International Council for the Exploration of the Sea (ICES) rectangle 43F0 (Blocks 21/24) in an area of spawning and nursery grounds for several commercially important species. The timing of the project will take place at a time when a number of fish species may be found to be using the area as spawning, juvenile or nursery locations. Sightings of cetaceans are most common during the months of July to October. Seals are not expected to be seen at the remote location. Seabirds are most common in the area during the late summer months of August and September when expected density is 10-20 individuals per square km. The project area is primarily used for demersal fishing, but with a very low historical effort. Shipping intensity at the project location is very low except for oil and gas related shipping traffic. The surrounding area comprises other oil and gas infrastructure within 8.8km but is not within a military activity zone. The closest active cable is 34km east southeast called the North Sea Link Interconnector. There are no marine aggregate sites or renewable energy locations in proximity. An unknown wreck was identified approximately 3.4km southeast of the location.

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 to the environment from the activities associated with the project were assessed, with focus on the predominant impacts resulting from physical presence from the rig / vessels, atmospheric emissions from drilling rig including, vessel use and helicopter flights, planned discharges to sea from chemical use and discharge, seabed disturbance from siting the rig, noise, and accidental events such as an oil release.

The drill rig has the potential to cause interference to other users of the sea, namely fishermen and vessel traffic, however the rig and support vessels will be located in a safety zone for the well. Its presence within the safety zone means only authorised vessels would be allowed within the 500 m radius of the well, therefore excluding other users of the sea. Given the low importance of the fishing area and the low vessel traffic, and that the drilling project is a temporary activity - the impact is assessed not significant. A support vessel will be on site continually to monitor for vessel traffic and provide alerts.

The area of seabed disturbance resulting from temporary disturbance from rig positioning in the form of anchor chains, anchors and transponder beacon is 0.058km². With an area of permanent impact of 25m² from the installation of the wellhead and xmas tree. The discharge of cuttings to the sea bed from the upper sections will result in an estimated 269,000kg of mud and cuttings which are expected to consist of a mound which extends around the wellhead location out to 100m.

The main receptor impacted by seabed disturbance will be the benthic communities. Physical disturbance can cause mortality or displacement of benthic species in the impacted zone. The temporary installation of the drill rig anchor system is not expected to result in significant changes to sediment properties and rapid recovery of faunal communities within the disturbed area may be expected through a combination of larval settlement and migration of animals from the adjacent seabed once the anchors and moorings are removed. Therefore, the impact on benthic communities will not be significant.

The nearest protected site at 5.4km east is the East of Gannet and Montrose NCPMA, there is no expected impacts on the protected features of the site from the project activities as the seabed impacts and discharges are not expected to extend to this distance.

Offshore chemicals will be used and discharged during the drilling of the well. The use and discharge of the chemicals have been risk assessed and modelled in accordance with other regulatory requirements. The use and discharge modelling shows a low risk to the environment from the chemicals. Use and discharge of chemicals is not expected to have a significant impact on the environment.

There will be no discharge of LTOBM or RDIF OBM mud or cuttings.



Emissions to air are possible from combustion plant used on the rig, support vessels, helicopter flights. The emissions will not have a detrimental effect to local air quality over the long-term, and the contribution to climate impact is insignificant. The environmental effects from emissions to air are not expected to have a significant impact on the environment.

There are no expected transboundary effects, in the context of this well with the nearest boundary (UK/Norway Median Line) is approximately 92 km west of the operations.

The well is sub-hydrostatic and therefore there is no chance of a well blow-out. As such the worst-case scenario of a large diesel spill from the MODU has been considered but is unlikely to result in a Major Environmental Incident. An Oil Pollution Emergency Plan (OPEP) is in place covering all operations from the COSL Innovator semi-sub rig.

The operations will be carried out in accordance with the Scottish National Marine Plan objectives.

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