Our Ref: 01.01.01.01-6294U
UKOP Doc Ref:1362471

Offshore Petroleum Regulator
for Environment & Decommissioning

TOTALENERGIES E&P NORTH SEA UK LIMITED
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LONDON
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Registered No.: 03682299

Date: 18th September 2024

Department for Energy Security & Net Zero

AB1 Building
Crimon Place
Aberdeen
AB10 1BJ

Tel [redacted]
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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
CULZEAN, WELL 22/25a- CIA planned well

A screening direction for the project detailed in your application, reference DR/2487/0 (Version 5), dated 17th 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.

Yours faithfully

Signature Not Verified

Digitally signed by Department for Energy Security and Net Zero
Date: 2024.09.18 09:20:41 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

CULZEAN, WELL 22/25a- CIA planned well

DR/2487/0 (Version 5)

Whereas TOTALENERGIES E&P NORTH SEA UK LIMITED has made an application dated 17th 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/16494/0/IDA/1.

Effective Date: 18th September 2024

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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 September 2024 until 16 August 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: N/A

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]

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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 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) (theRegulations);

c) the results of any preliminary verifications or assessments of the effects on theenvironment of the project; and

d) any conditions that the Secretary of State may attach to the agreement to thegrant 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 Project

-Drilling of the infill development producer CIA well

-Drilling of 36" and 26" well sections using water based mud (WBM) and 17 ", 12 " and 8 " hole sections using low toxicity oil based mud (LTOBM).

As set out in WONS/16494/0/IDA/1.

Description of Project

The CIA well will be drilled in slot number 1 at the well head platform in five holesections; the 36" and 26" hole sections will be drilled riserless with seawater / water based mud (WBM) with the mud and cuttings being discharged directly to the seabed. The 17 ", 12 " and 8 " hole sections will be drilled using low toxicity oil based mud (LTOBM). The recovered base oil will be recycled into the LTOBM system and

the processed cuttings will be treated and discharged to sea.

Completion operations do not form part of this application. Once these details have been confirmed a variation application will be made. The siting of the Valaris Stavanger atthe Culzean Wellhead Platform (WHP) is permittedunder CL/693/9.

No cumulative impacts are expected to occur with any other existing or approved projects. It is not considered to be likely that the project will be affected by natural disasters.

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.

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 Culzean field is an ultra-high pressure high temperature (uHPHT) reservoir located in the Central North Sea (CNS). The Culzean Field Development is located in Block 22/25 of the CNS c. 235 km from the Scottish coastline, c. 20 km from the United Kingdom (UK)/Norway median line, and in a water depth of c. 88 m. The seafloor observed across the CIA well project area is largely homogeneous. Sediments observed were predominantly muddy sand/sandy mud with areas of shell fragments cobbles, boulders. The mean wave height in the area is 2.1 m, with the majority of waves coming from the north.

Site specific surveys indicate that sediments in the area consist predominantly of deep circalittoral sand and deep circalittoral mixed sediment. Fauna observed included anemones (Actiniaria), starfish (Asteroidea), soft coral (Alcyoniumdigitatum) and cod (Gadus morhua). Faunal tracks, tubes and burrows were also present. Faunal tracks, tubes and burrows were also present. The OSPAR threatened and/or declining habitat 'Seapens and burrowing megafauna communities' was observed in the survey area as observed in photographic data. No siphons or other evidence of live specimens of the ocean quahog Arctica islandicawere identified.No other Annex I habitats or Annex II species, OSPAR threatened and/or declining species and habitats or UK Biodiversity Action Plan priority habitats and species were observed within the survey area.

There are no SPAs, SACs or SCIs in the vicinity of Culzean. The nearest SAC is the Scanner pockmark SAC which lies c.148 km to the northwest and is protected for the Annex I habitat "Submarine Structures made by Leaking Gases". The nearest protected area is the East of Gannet and Montrose Fields NCMPA,

locatedapproximately c.16 km west of the CIA well.

Fish spawning and nursery activity will occur in the area, which may coincide with the drilling operations. Harbour porpoise, white-beaked dolphin and minke whale may occur in the area.Distribution maps based on telemetry data (1991 - 2016) and count data (scaled to the estimated population size in 2015) indicate that harbour seals are unlikely to occur in the vicinity of the operations. However grey seals were recorded at densities of 5-10 individuals per km2 to the south of the operation Block, it can therefore not be ruled out that grey seals may occur in the vicinity of the operations. Seabird vulnerability in Block 22/25 is predominantly low all year round. The project area is primarily used for Pelagic fishing and the effort in the area is rated low.

The Culzean development is located in a well-developed oil and gas production area with a number of installations, pipelines and umbilicals present. There are no aggregate extraction areas, submarine telecommunication cables, or existing/proposed renewable energy developments within the vicinity of Block 22/25.There are wrecks in the vicinity, four offshore wrecks lie within an c. 20 km radius of the CIA. The closest wreck is located c. 12 km to the south-east and south-west. The CIA well lies within the Innovation and Targeted Oil and Gas (INTOG) area, INTOG-E-a. The closest approved offshore wind farm is E1, which is located c. 97 km west of the well. The closest operational wind farm is the Hywind Scotland Pilot Park c. 194 north-west of the well. This well is not in the vicinity of any approved INTOG projects. Shipping density in the area is relatively high and is concentrated around the Oil and Gas Infrastructure.

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 Culzean Well head Platform excluding unauthorised access of vessels.

In summary, the cuttings associated with the 36" section will be discharged at the seafloor and will settle out in close proximity to the well as this section will be drilled 'riserless', whilst the cuttings from the 26" sections will be discharged from the rig and are expected to settle over a wider area. The return path is formed once the 30" conductor pipe is run in 36" open hole and cemented. The 26" section is drilled with

30" conductor pipe in place, hence mud cuttings are brought to surface and discarded over the shakers. Cuttings from the 17 ", 12 " and 8 " sections will be thermally treated (Rotomilled) and discharged.

Although no live specimens of Ocean quahog were found at the survey stations, the nearest protected area East of Gannet and Montrose Fields NCMPA, locatedapproximately c. 20 km west of the CIA well. It remains possible that individuals of this species may be directly impacted by seabed disturbance as a result of the removal and relocation of debris and boulders and the settling of drill cuttings, potentially resulting in individual mortality. It is not considered that the potential loss of a small number of juvenile individuals of this species will result in a significant effect on the population viability of this species.

In the vicinity of the proposed CIA well location, the OSPAR threatened and/or declining habitat 'Seapens and burrowing megafauna communities' was observed in photographic data. Given the small area of disturbance and the widespread nature of the burrows across the wider area, it is unlikely that even in the worst-case scenario that the drilling activities will result in a significant impact on megafauna burrows.

Discharge of offshore chemicals has been assessed as not likely to have a significant effect on the environment. The discharge of cuttings contaminated with OBM is limited to OBM concentration of <1% (by weight). Based on experience of use with the Rotomill, TotalEnergies have assumed any residual base oil on the processed cuttings will represent less than 0.5% of the discharge. This discharge has been assessed and is not considered to have a likely significant effect on the environment.

For aborted cementing operations, while it is conceivable that some of the cement solids may self-consolidatein situ, any such setting is more likely to be sparsely and sporadically distributed rather than generating large layers of hard rock. Therefore, discharge of this nature is not expected to have any significant effect on deterioration in water quality or any significant impact on benthos or fish populations.

Although the area in vicinity of the well is indicated as potentially supporting fish spawning and nursery activity at certain times of the year, the relative proportion of these spawning and nursery areas affected by the drilling activity will be small and not significant.

There are no expected transboundary effects from the drilling operations at the Culzean WHP. The nearest boundary (UK/Norwegian median) is located approximately 20 km from the operations. It is not considered likely that any planned operational discharge (chemicals) will be detectable at this distance from the well location.

The emissions associated with the project result from power demand for the proposed operations. A small temporary increase in atmospheric emissions is anticipated during drilling operations as the Valaris drilling rig comes alongside the Culzean WHP to complete this operation. It is expected the emissions will be rapidly dispersed and are not likely to have a significant impact on any sensitive receptor.

Although not a planned activity, a worst-case major accident scenario resulting from a potential well blow-out was modelled and assessed. Although the consequences of an oil spill can be severe, the probability of a large oil spill from the proposed operations is low. Therefore, it is considered that the control measures in place to prevent loss of well control minimise the risk of an oil spill and the proposed operations carried out as planned are not likely to have a significant effect on the environment. The modelling of hydrocarbon releases to the marine environment arising from a major accident occurring at the CIA well indicates that they will not cause a Major Environmental Incident.

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

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