

Our Ref: 01.01.01.01-6299U
UKOP Doc Ref:1363088



**Offshore Petroleum Regulator for
Environment & Decommissioning**

BP EXPLORATION OPERATING COMPANY LIMITED
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MIDDLESEX
TW16 7BP

Registered No.: 00305943

Date: 23rd 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
MIRREN, PRODUCER WELL 22/25b- 8**

I refer to your amended application dated 19th September 2024, reference DR/2489/1 (Version 1).

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

[REDACTED]



**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**

MIRREN, PRODUCER WELL 22/25b- 8

DR/2489/1 (Version 1)

Whereas BP EXPLORATION OPERATING COMPANY LIMITED has made an application dated 19th 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/16496/0/GS/1 v2

Effective Date: 23rd 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 30 April 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]



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 by OPRED 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

Re-enter the existing 22/25b-8 well

Drill 8.5" and 6 " sections of W152-ST (a sidetrack of 22/24b-8)

Completion of the well

Well clean up

Contingent sidetrack of one or more sections.

(WONS/16496/0/GS/1 v2)

Summary of the Change to the Project



A change to the project was requested under DR/2489/1 (version 1) to extend the end date of the operations to account for delays to the project.

Description of the Project

The drilling of the Mirren production well (W152-DT) will be undertaken from the Noble Innovator Heavy Duty Jack Up (HDJU) rig by re-entering and sidetracking from the existing 22/25b-8 well. Drilling operations may take up to 80 days to complete.

The 8.5" and 6" sections of the well will be drilled using low toxicity oil based mud LTOBM, cuttings will be skipped and shipped to shore. The well will be cleaned up prior to entering the production phase, The screening direction covers the period 9 August 2024 to 1 March 2025.

No cumulative impacts are expected to occur with any other existing or approved projects. The risk of a major accidents and environmental effects from major accidents, such as a well blowout has been assessed. The Developer has control measures in place to reduce the risk of a major accident occurring and the probability of such an event occurring is very low.

There is not likely to be any significant impact of the project on population and human health. It is not considered likely that the project will be affected by natural disasters. No nuisances are foreseen from the project.

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 Mirren production well is located approximately 220km east from the Shetland coastline in Scotland and 23 km from the UK/Norwegian median line, in an area where water depth is approximately 94 m.

The predominant current in the location is dominated by the Norwegian Atlantic flow. The project location is not within any protected areas, with the closest being approximately 19 km distant. Site-specific surveys identified the seabed as comprising of gravelly sand with varying proportions of shell accumulations, pebbles, cobbles, and boulders. The main sediment type is described as circalittoral muddy sand. The benthic species identified were more prevalent near or on cobbled and stony areas. The most commonly observed benthic fauna included sea urchins, starfish, hermit crabs, scallop, polychaete tubes, and soft coral. The sediments within the area were described as comprising the broad scale Priority Marine Feature (PMF) habitat 'offshore subtidal sands and gravels' which is the preferred habitat for ocean quahog *Arctica islandica*. Ocean quahog are a PMF and are also on the OSPAR List of Threatened and/or Declining Species (OSPAR, 2008), however no ocean quahog were recorded within the area. No Annex I habitats were identified during site surveys



in the Mirren area.

The project works will take place during a period when a number of fish species may be found to using the area as spawning or nursery locations. Sightings of cetaceans are most common between the months of May and August. Seals are not expected to be seen at the remote location. Seabird sensitivity is low throughout the year. The project area is primarily used for demersal fishing, but with a very low historical effort. Shipping intensity at the project location is also low. The surrounding area comprises other oil and gas infrastructure within 20 km, but is not within a military activity zone, the Tampnet telecommunications cable is located 13.5 km southeast of the well location, there is one wreck located 8.2 km northeast of the well location. There are marine aggregate sites or renewable energy locations in proximity.

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 change to the project were assessed, with focus on the predominant impacts resulting from seabed disturbance, atmospheric emissions from rig and vessel use, marine discharges, and accidental events such as an oil spill. 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 well will be drilled from the Noble Innovator heavy duty jack up rig. There is an existing 500m safety exclusion zone in place (at the Mirren Drill Centre) which excludes unauthorised access of vessels and prohibits access to fishing vessels.

All appropriate notifications to mariners will be made prior to the well drilling activities commencing. Fishing activities within the area are low, and shipping density is considered to be low. No additional impacts to other marine users are identified as part of the drilling of W152-ST well. Therefore, there are no significant effects likely in terms of physical presence from the proposed project.

Seabed disturbance will arise during drilling operations due to the temporary placement of the rigs 3 spudcans, affecting an area of 0.001m². the seabed of the Mirren field is typical of the wider area; characterised by sand and muddy sand. It is expected that seabed deposits will cause mortality of some individuals, impacts to the benthic communities on a large scale are not expected. Recovery of faunal communities within the disturbed area may be expected through a combination of larval settlement and immigration of animals from the adjacent seabed once the cuttings deposition ceases. Therefore, based on the above, impacts on benthic communities from the spudcan placement will be temporary, localised and not significant.



Discharge of offshore chemicals associated with the drilling of the well, cementing and completion operations have been assessed as not likely to have a significant effect on the environment.

The proposed operation will utilise an emergency rescue and response vessel (ERRV), supply vessel, and a HDJU. Atmospheric emissions have been assessed from the diesel used for each vessel and the time spent on location. The proposed operations will result in an increased atmospheric emission within the localised area. Contribution of which amount to approximately 0.035% (including GWP) of the total atmospheric emissions associated with UK offshore activities in a year. The emissions may result in a short-term 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 well to be drilled is a production well, and an assessment has been included within the project proposal to assess as a worst case, an uncontrolled well blow out, and the subsequent potential for a Major Environmental Incident (MEI). The assessment concluded that there is no potential for an MEI to occur, nevertheless, the risk of an oil spill event as a result of a well blow out from W152-ST well is minimal, and the developer has suitable mitigation in place to prevent such an occurrence.

The drilling operations are in accordance with the National Marine Plan for Scotland's objectives and policies. It is considered that the drilling of the W152-ST well is not likely to have a significant impact on other offshore activities or other users of the sea and no cumulative impacts are expected to occur. There are no planned expected transboundary impacts because of the project.

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:

n/a