

Our Ref: 01.01.01.01-6335U  
UKOP Doc Ref:1363907



**Offshore Petroleum Regulator for  
Environment & Decommissioning**

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Registered No.: 00825828

Date: 27th September 2024

Department for Energy Security &  
Net Zero

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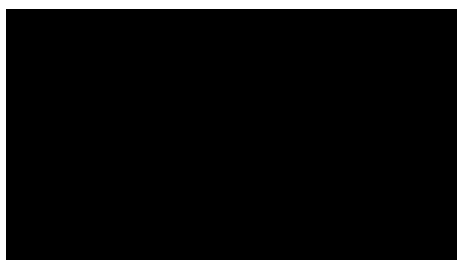
Dear Sir / Madam

**THE OFFSHORE OIL AND GAS EXPLORATION, PRODUCTION, UNLOADING  
AND STORAGE (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS  
2020**

**CLAYMORE, Claymore A Platform, DRILLING INJECTOR WELL 14/19-C77Z**

A screening direction for the project detailed in your application, reference DR/2495/0 (Version 1), dated 16th 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](http://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](mailto: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**

**CLAYMORE, Claymore A Platform, DRILLING INJECTOR WELL 14/19-C77Z**

**DR/2495/0 (Version 1)**

Whereas REPSOL RESOURCES UK LIMITED has made an application dated 16th 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, WONS/16655/0/GS/1 Version 1 and WONS/16723/0/GS/1.

Effective Date: 27th 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 1 October 2024 until 31 July 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](mailto: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](mailto: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**

### **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**

- Drilling of the 14/19-C77Z water injection well (here on referred to as the C77z well) from the Claymore platform.
- 12.25" and 8.5" Sections to be drilled with Low Toxicity Oil-Based Mud (LTOBM). The 8.5" section may be reduced to 6" in the event of any issues identified whilst drilling the 8.5" section.
- Potential 8.5" fallback option (geological sidetrack) to also be drilled with Low Toxicity Oil-Based Mud (LTOBM). The 8.5" section may be reduced to 6" in the event of any issues identified whilst drilling the 8.5" section.
- Well completion
- Wellbore clean-up

### **Description of the Project**





The C77z well 12.25" and 8.5" sections are to be drilled with Low Toxicity Oil-Based Mud (LTOBM), the application also accounts for a potential fall-back option to drill a further 8.5" section also with LTOBM. The well will be drilled to target depth followed by the well bore clean-up and xmas tree installation.

The 12.25", 8.5" and 8.5" fall- back sections will use Low Toxicity Oil Based Mud (LTOBM) that will generate a maximum of 546,737 kg of drill cuttings entrained with LTOBM. For all LTOBM sections, mud and cuttings will be contained and skipped and shipped to shore for disposal.

A well bore clean-up will be performed which will be routed to the Claymore Produced Water (PW) system. All clean up pills will be skipped and shipped for appropriate disposal. The clean-up operation includes provision for five well volumes to be directly discharged in the unlikely event the Claymore PW treatment system is unavailable. Following well bore clean-up the Christmas tree will be installed.

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

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.

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.

### **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 Claymore platform from where the C77z well will be drilled is in the central North Sea (CNS) in United Kingdom Continental Shelf (UKCS) Block 14/19, approximately 130 km northeast of the Scottish coastline and 102 km from the United Kingdom (UK)/Norway boundary line, in approximately 111 m water depth Lowest Astronomical Tide (LAT). Residual currents at Claymore range 0.05 m/s - 0.1 m/s and run anticlockwise. In the vicinity of the Claymore platform, the annual mean significant wave height is 2.32 m.

Local site surveys identified the seabed sediments in the area comprise sandy muds. Offshore circalittoral mixed sediments have also been recorded in the wider area. Seapen and Burrowing Megafauna Communities and *Arctica islandica* have been recorded in areas around the Claymore field but are not observed in the immediate vicinity of the platform. Ocean quahog ( *Arctica islandica* ) and the Seapen and burrowing megafauna communities habitat ('Burrowed Mud') are Priority Marine Features (PMF) and listed as Oslo and Paris Convention (OSPAR) threatened and/or declining species / habitats. Local surveys indicated that the benthic environment



was uniform and comprised various megafaunal and infaunal species, typical of sandy mud habitats in this region of the North Sea. Pockmarks have been identified in the wider area (some 13km from Claymore) but these were found to be inactive.

The closest protected site to the area of proposed operations is the Central Fladen Nature Conservation Marine Protected Area, located approximately 43km North of the proposed operations.

Fish spawning and nursery activity will occur in the area and coincide with the drilling operations. Commercial fisheries comprise mainly pelagic landings with demersal and shellfish landings also recorded. Fishing effort in the area is very relatively low as compared to other areas of the North Sea and is dominated by trawling gear. Seabird sensitivity in the region of the Claymore platform ranges from is low to high throughout the year. A number of cetacean species are identified in the area mainly in the summer months, however, numbers range from low to very high year-round. Given the distance from shore, the presence of seal species is unlikely.

Shipping density in Block 14/19 is low. There are several oil and gas fields nearby with the closest being approximately 19km away. The project is not within a military exercise or danger areas and there are no existing cables crossing the area of the proposed operations. There are no established renewable energy sites in the immediate vicinity, however, the application recognises potential development and lease areas for renewable energy sites, the closest of which is located 23km from the platform. There are no known wrecks of historical importance within the vicinity of the proposed operations.

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 physical presence, seabed disturbance, noise, atmospheric emissions, planned discharges and accidental events such as an oil spill. There is not likely to be any significant impact of the project on population and human health.

The Claymore platform is located within a 500 m safety zone which has been in place since 1976. Shipping in the area is also expected to be low. As no new infrastructure is being installed to drill this well and the drilling activities are all undertaken from the platform, impacts on other sea users are not anticipated.

Significant impacts on benthic fauna are not expected, as all cuttings from the 12.25",



8.5" and 8.5" fall-back sections will be skipped and shipped to shore for appropriate disposal.

Several spawning fish species are identified in the area, however, as all mud and cuttings are to be skipped and shipped to shore for appropriate disposal the operations are not likely to have a significant effect on fish species.

Cetacean sightings are identified year-round with the majority occurring over the summer months with densities ranging from low to very high. The proposed operations are unlikely to have a significant impact on these species. Likewise, due to the distance from shore, seal species are unlikely to be impacted.

Offshore registered 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.

The wellbore clean-up operations may result in the discharge of wastewater containing residual base oil from the LTOBM. This discharge has been assessed and is not considered to have a likely significant effect on the environment.

The well will be perforated using small explosive charges. These will be detonated between 1,432m and 3,981m down hole and are therefore not expected to cause any noise impacts in the surrounding environment.

Atmospheric emissions from drilling the well are not expected to increase the emissions already realised at the platform. Increased emission will occur as a result of the presence of a dedicated supply vessel and increased helicopter flights. No well test or flaring is planned. The emissions are estimated to contribute a very small percentage of the total annual emissions estimated for offshore activities in the UK and are not expected to result in a significant impact on the environment.

There are no expected transboundary effects from the drilling of the C77z well due to the localised and temporary nature of the impacts and the 102 km distance from the UK/Norway Median Line, which is the nearest boundary. It is not considered likely that any planned operational discharge will be detectable at this distance from the well location.

A worst-case major accident scenario resulting from a potential well blow-out was modelled and assessed. The Developer has mitigation and control measures in place to prevent loss of well control and minimise the risk of an oil spill which could have a significant impact. The proposed operations carried out as planned are not likely to have a significant effect on the environment and the probability of a large oil spill from the proposed operations is low.

There are no operational renewable energy sites in the immediate vicinity, nor any under construction and there are no known wrecks of historical importance or military



activity within the vicinity of the proposed operations. The drilling operations are in accordance with the National Marine Plan for Scotland's objectives and policies. It is considered that the proposals are 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.

### **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