

Our Ref: 01.08.06.15/481C
UKOP Doc Ref:1371644



Offshore Petroleum Regulator
for Environment & Decommissioning

REPSOL RESOURCES UK LIMITED
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Registered No.: 00825828

Date: 25th November 2024

Department for Energy Security &
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Dear Sir / Madam

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

I refer to your amended application dated 13th November 2024, reference PR/2207/1 (Version 2).

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



**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 CHANGE TO PRODUCTION

PR/2207/1 (Version 2)

Whereas REPSOL RESOURCES UK LIMITED has made an application dated 13th November 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, PCON/8066/0 (Version 2).

Effective Date: 25th November 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

This screening direction shall be valid from 1 January 2022.

2 Change to production level(s)

The holder of the screening direction shall ensure that the change in the level(s) of production do not exceed the amended level(s) detailed in the application for the screening direction, and in the application for consent relating to the approval for the getting of petroleum issued under the relevant production licence Model Clause.

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, using the appropriate Environmental Emissions Monitoring System (EEMS) reporting forms.

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 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 change to the project

Extension of current production consent at Claymore Field for 2025-2027 inclusive due to drilling of three sidetrack wells C80 (CFC), CAU CAC and NW MAC (CHK).

Application (PR/2207/1) to change the project, included certain updates to the baseline environmental data which is captured below. The following assessment record has been updated where relevant and remains valid.

Summary of the project

Increase in oil production from the Claymore field.



Description of the project

PR/2207/1

This project consists of an extension of oil and gas production for the years 2025 - 2027 inclusive of less than 500 tonnes per day at the Claymore field which is enabled by the drilling of the following wells:

CAU CAC sidetrack is planned in 1H 2025 (as described in DRA/1094);
C80 (CFC) sidetrack is planned in 4Q 2024 (as described in DRA/1049);
NW MAC (CHK) WI sidetrack is planned in 1H 2025 (as described in DRA/1075).

The proposed wells are planned to become operational at various stages in 2025 and whilst there will be an increase in production in 2026 compared to 2025, it will remain below the currently consented levels.

PR/2207/0

This project consisted of an increase in oil production of less than 500 tonnes per day at the Claymore field due to the proposed re-purposing of the C90 existing well to drill a side-track into the Northern Area Claymore field in 2022, workover to improve production at C71 well in 2023 and proposed drilling of a Central Area Claymore infill well in 2024. The increase in production was proposed to be in the years 2023 and 2024, although production consent was applied for from 2022 - 2024.

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

There is no change to the assessment of a major accident. 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.

It is not considered to be likely that the project will be affected by natural disasters.

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 project area is in Block 14/19 in the Central North Sea (CNS) approximately 130 kilometres (km) from the Scottish coast of the UK and 102 km from the UK/Norway median line, in an approximate water depth of 111 metres (m). Typical current speed is 0.1ms⁻¹ for both the Atlantic and Fair Isle Dooley current. Surface tidal currents



ranges between 0.11 to 0.5ms-1.

Sediments around the wider Claymore platform are composed of sands, gravels and muds including the muddy beds of the Fladen and Witch Grounds. The platform is located to the northwest of the Witch Grounds Formation in an area of deep circalittoral mud. Surveys at sites located 6, 13 and 15km from the platform completed in 2020 showed 'sandy mud' and 'deep circalittoral mud'.

Detailed review of the results from the closest survey location 6km from the platform found 'sea pens and burrowing megafauna in circalittoral fine mud', circalittoral mixed sediment and circalittoral fine mud. Burrowing megafauna including Norway lobster and two sea pen species, *Virgularia mirabilis* and *Pennatula phosphorea* were widespread across site surveys. Burrow counts and images found that many locations met the criteria for the OSPAR listed as threatened/ declining habitat 'sea-pen and burrowing megafauna communities', a UK Habitat Feature of Conservation Importance and UKBAP listed habitat 'mud habitats in deep water'. Juvenile ocean quahog were also found at these survey sites.

Benthic communities of the central North Sea are dominated by polychaetes and bivalves with brittlestars and more dispersed crab species. The survey in the vicinity of the platform found other megafauna including anemones, crustaceans, tubes, shrimp, ling and anthozoans.

The closest areas protected for Annex I habitat are the Braemar Pockmarks Special area of Conservation (SAC) designated for the protection of submarine structures made by leaking gas 112km away and the Scanner Pockmark designated for a large seabed depression 70 km away. These are now referred to as sites of national importance retaining the same protection under UK as EU legislation. Pockmark distribution correlates to the Witch Ground. The Claymore platform is located northwest of this area.

Fish spawning and nursery activity occur in the area, which will coincide with the operations. The area is not suitable for herring spawning.

Seabird vulnerability is highest in May and June, moderate September, October and December and lower early in the year. The surrounding areas include higher and lower sensitivity compared to block 14/19 in May and June but similar lower sensitivity between January and March.

Two cetacean species have been sighted specifically in the platform area, white-beaked dolphin and harbour porpoise however nine species are found in the wider area. All species are found in low to very high densities throughout the year. Seals are not expected to be seen at the remote location.

Block 14/19 falls within International Council of the Sea (ICES) rectangle 45E9, and fishing in this area (2022) concentrates on pelagic species. Fishing activity is at its lowest from January to May. The period of greatest fishing activity is December, but the largest catch is October with the highest value.



Claymore platform is located in a 500m statutory safety exclusion zone with a low amount of shipping in the area. The project location is not within a military activity zone, there is no submarine cables, aggregate extraction, and the nearest oil and gas installation is 19km away.

A marine renewable energy Crown Estate Lease site is located 23km from the platform. No scheduled monuments (including protected wrecks) or Historic Marine Protected Areas are identified close to the platform however, five other wrecks/obstructions are identified within 10 km of the platform.

The Claymore field is located within the Scottish National Marine Plan area.

Given the location of the project, it is not likely that the areas identified at paragraphs 2(c)(i), (iii), (iv), (vi), (vii) or (viii) 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, 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.

Proposed production from the C90, C71, Central Area Claymore infill well (PR/2207/0) and drilling of CAU CAC, C80 (CFC) and NW MAC (CHK) (PR/2207/1) is unlikely to require any change to current helicopter and vessel trips to the platform with no change in diesel consumption and associated atmospheric emissions.

There is not expected to be any significant change in flaring. Combustion plant remains the same and will run more efficiently being oversized for current service. There will be no modifications to the platform production system. There is not anticipated to be any change in atmospheric emissions and no likely significant impact upon the environment.

In PR/2207/1 , The change in oil and gas levels over the three years requested (2025, 2026 and 2027) represents an overall decrease from the current consented levels for 2024. Produced water will increase by up to 3,308m³ / day in 2027, however, the drilling of C80, NW MAC wells and a number of planned well workovers in 2025 is aimed at increasing available produced water injection capacity at the Claymore platform. The increase in the volume of produced water is not anticipated to impact on current oil in produced water levels, no chemical application rates are expected to change and no new chemical applications are anticipated.

The requested extension to production is not expected to result in an increase in the



total quantity of oil and gas to be extracted over the lifetime of the Claymore field.

In PR/2207/0 , there was not anticipated to be any change in chemical requirements for production other than chemicals with zero discharge applied to the oil export pipeline. The proposed increase in oil production was associated with a decrease in produced water volume between 2021 and 2023 with a minor increase in 2024. The volume in 2024 was lower than 2021. This trend was mirrored by associated changes in de-oiler and super clarifier to maintain the concentration of oil in water to the permitted discharge limit.

Chemicals are risk assessed to ensure no significant impact upon the environment.

The platform is located approximately 30km from other active development and 100km from the median line with Norway. Emissions and discharges are not expected to have significant cumulative or transboundary effects. The Claymore platform has been in place since 1976 (CAP platform since 1996), surrounded by 500m safety zones. Shipping in the area is low and as such, their presence and that of associated supply vessels is unlikely to significantly impact other sea users.

It is considered that the increase in oil production from the Claymore field (PR/2207/0) and extension to production into 2025, 2026 and 2027 (PR/2207/1) are not likely to have a significant impact on other offshore activities or other users of the sea, the seabed, marine life or cetacean species and no cumulative impacts are expected to occur. The operations will be carried out in accordance with the Scottish National Marine Plan objectives.

There is no increase in the risk from accidental events as a result of the change to production.

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.