Our Ref: 01.01.01.01-5806U
UKOP Doc Ref:1373505

Offshore Petroleum Regulator
for Environment & Decommissioning

BP EXPLORATION OPERATING COMPANY LIMITED
CHERTSEY ROAD
SUNBURY ON THAMES
MIDDLESEX
TW16 7BP

Registered No.: 00305943

Date: 3rd December 2024

Department for Energy Security &
Net Zero

AB1 Building
Crimon Place
Aberdeen
AB10 1BJ

Tel [redacted]
Fax

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
MURLACH, NOBLE INNOVATOR DRILLING 22/24h-MUR SD

I refer to your amended application dated 27th November 2024, reference DR/2411/4 (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

Signature Not Verified

Digitally signed by Department for Energy Security and Net Zero
Date: 2024.12.03 11:05:23 GMT
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

MURLACH, NOBLE INNOVATOR DRILLING 22/24h-MUR SD

DR/2411/4 (Version 2)

Whereas BP EXPLORATION OPERATING COMPANY LIMITED has made an application dated 27th 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, WONS/15379/0/IDA/1, WONS/15379/0/C/1.

Effective Date: 3rd December 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 26 September 2023 until 31 May 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:

The Department has no further comments

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

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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 assessments undertaken by OPRED

To determine whether an Environmental Impact Assessment is required for this project. This document 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:

- The information provided by the developer;

- The matters listed in Schedule 5 of The Offshore Oil and Gas Exploration, Production, Unloading and Storage (Environmental Impact Regulations 2020) (the Regulations);

- The results of any preliminary verifications or assessments of the effects on the environment of the project; and

- Any conditions that the Secretary of State may attach to the agreement to the Grant of consent.

Characteristics of the Project

Having regard, in the 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

The drilling of the MUR-SD producer well from the Noble Innovator jack up rig

- Drilling of the 42", 36" and 26"section will be undertaken riserless using seawater and hi-vis-sweeps with cuttings discharged directly at the seabed

-Top hole sections will be displaced to water based mud (WBM) prior to conductors being cemented in place and the well suspended whilst MUR-CD is drilled.

- Drilling of 16" 12.25" and 8.5" sections using Low Toxicity Oil Based Mud (LTOBM) with casing installed.

- Cuttings will be treated with Thermo-Mechanical Cuttings Cleaner Unit (TCC)

- Well Clean up and Completion

- Well perforated using coil tubing

- Well suspended and debris cap installed

- Contingency of a re-spud or Mechanical side track.

The drilling operations are detailed in the application to the NSTA reference WONS/15379/0/IDA/1, WONS/15379/0/C/1.

Summary of the change to the project:

A change to the project was requested under DR/2411/4 (version 2) to extend the operational phase to account for delays to the operations. This resulted in a minor amendment to the atmospheric emissions from the project.

Description of the Project

The drilling of the 2 wells (MUR-SD and MUR-CA) at the Murlach development area were considered as part of the Murlach Development (redevelopment of Skua, part of the Marnock-Skua field) Environmental Statement (ES) ES/2022/002. Agreement to the grant of consent for the ES project has been issued by the Department and development and production consent was issued by NSTA on the 8th September 2023.

The project is to drill the 42", 36" and 26" riserless using seawater and hi-vis sweeps prior to conductors being cemented in place and displaced to water based mud (WBM). The well will be suspended and the rig will spud the MUR-CA well. Following return to MUR-SD the 16", 12.25" and 8.5" will be drilled using Low Toxicity Oil Based Mud (LTOBM). Cuttings from the top sections drilled with seawater will be discharged at the seabed. Cuttings from the LTOBM sections will be thermally treated and discharged.

Should thermal treatment facilities become unavailable cuttings will be skipped andshipped to shore for disposal. Casings and liner will be cemented in place, the wellbore cleaned, lower completion and packer run, cleaned to brine and upper completion run and tested in brine. The well will be perforated using coil tubing prior to the well being suspended and debris cap installed.

There is the potential for cumulative impacts to occur for the MUR-SD well associated with the drilling of MUR-CA well however due to proximity of both wells it is anticipated that the cuttings from both wells will form a single cutting piles. The total combined seabed impact has been assessed and the estimated impact is 0.011145km2.

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 proposed drilling project is located in the Murlach Development (part of the Marnock-Skua field) in the Central North Sea,in UKCS Block 22/24h, approximately 206 km East of the Scottish coastline,and 39 km west of the UK/Norway Median Line, in a depth of 95 metres (m). Theseabed in the area of the Murlach Development comprises of sandy mud/muddy sand, shell fragments with occasional pebbles, cobbles and boulders with seabed depressions were present within the Murlach area. These were identified as most likely representing anthropogenic anchor-pull pits and scour features. The annual mean significant wave height ranges from 2.11 to2.4m.The mean residual currents in the area are 0.1m/s.

Benthic surveys identified the Fauna in the Murlach area included; sea pens (Pennatulaphosphorea, Virgularia mirabilis), hermit crabs (Paguridae including Pagurusbernhardus), brittlestars (Ophiuridae), starfish (Asteroidea: including Asterias rubens and Astropecten irregularis), anemones (Actiniaria including Hormathia sp.), colonial anemones (Epizoanthuspapillosus), soft coral (Alcyonacea), squat lobsters (Munida sp.), sea spiders (Pycnogonida), NephropsNephrops norvegicus, crabs (Brachyura including Majidae and Liocarcinus depurator), hydroids (Hydrozoa) and Hydrozoa/Bryozoan turf. The sediments within the area were described as ascomprising 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 was recorded within the area.

Seapens were identified at multiple stations across the Murlach area with assessment suggesting the potential presence of the OSPAR (2008) threatened and/or declining habitat 'Seapens and burrowing megafauna' likely to occur in the vicinity of the proposed operations.

No Annex I habitats were identified during site surveys in the Murlach area. No other benthic features of conservation importance are thought to occur in the vicinity of the proposed operations. The Murlach development has one protected site within 40 km with East of Gannet and Montrose Fields NCMPA located 4 km west of the proposed

MUR-SD well. The project is within the Scottish National Marine Plan (NMP) area.

Seven species of cetaceans have been spotted in the waters around the Murlach Development:Atlantic white-sided dolphin, common dolphin, risso's dolphin, harbour porpoise, killer whale, minke whale, and whitebeaked dolphin. Grey and harbour seals may be encountered in the area;however, are not expected to be found in significant densities.

Seabird vulnerability in the vicinity of the Murlach Development is low throughout the year, with no data being available for November.

The proposed operations will coincide with fish spawning and/ or nursery activity forthe following species: anglerfish, blue whiting, cod, European hake, haddock, herring,lemon sole, ling, mackerel, Norway lobster, Norway pout, plaice, sandeel, spurdog and whiting.The project area is primarily used for demersal fishing and the fishing effort in the area is rated low. There are several oil and gas fields nearby. There are no submarine cables within 40km of the project. There are no nearby Ministry of Defence practice areas. There are no operational renewable energy sites, nor any under construction in the vicinity.

Shipping density in the area islow. There are four global wreck and obstruction points within 10 km of the proposed MUR-SD well with the closest being located 4.6 km northwest of the proposed well site. There are no historic Marine Protected Areas (hMPA) within Block 22/24. There are no shellfishwater protected areas within the vicinity.

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.

The well will be drilled from the Noble Innovator jack up rig, which has a 500m safety exclusion zone in place excluding unauthorised access of vessels and prohibiting access to fishing vessels. An ERRV will be on site and in addition to providing emergency support to the Noble Innovator, it will act as a guard vessel advising other users of the presence of the mooring anchors and lines which will extend beyond the 500 m exclusion zone. All appropriate notifications to mariners will be made prior to the well drilling activities commencing. Given that the MUR-SD well is located in an

area considered to be of low importance to the UK fishing industry, is in an area which has low shipping densityany impacts on other sea users is not considered to be significant.

The project will result in a total seabed disturbance of 0.01145km2. These seabed impacts will primarily arise the discharge of drill cuttings pile and the location of the 3 spud cans for the Noble Innovator.

During the drilling of the 42", 36" and 26" seawater, hi-vis sweeps and WBM with cuttings discharged at the seabed. WBM is mostly composed of natural constituents, watersoluble and will dissolve, dissociate and disperse during settlement, the residual current in the area is approximately 0.1 m/s therefore recovery is expected. Cuttings may smother benthic and spawning species, but this will be highly localised within a few hundred meters of the wellwith potential recovery. It is therefore not anticipated that there willbe a likely significant impact on the environment. The LTOBM cuttings generated willbe thermally treated and the resultant fine powder mixed with water and discharged to sea with <1% oil on cuttings. These are likely to remain in suspension in the watercolumn and be widely dispersed and readily assimilated into the natural sediments and therefore not likely to cause any significant impacts. Drill cuttings modelling has been conducted and concluded that the discharge of the drill cuttings is not expected to result in a significant adverse impact to the marine environment.

There is evidence of seapens in the vicinity of the Murlach development, with assessment suggesting the potential presence of the OSPAR (2008) threatened and/or declining habitat 'Seapens and burrowing megafauna' likely to occur. However Seapens are not expected to be significantly impacted at a population level by the proposed operations with drill cutting modelling having a deposition of 0.5mm limited to a few hundred meters from drill locations (MUR-SD and MUR-CA will form 1 cutting pile). No Annex I habitats have been recorded within the area.Therefore, there are not likely to be any significant effects.

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.

Fish, marine mammals and other benthic species (which may be PMFs, Annex II species and EPSs) are not considered to be significantly impacted. This includes noise impacts to marine mammals, as drilling and vessel noise is deemed below levels which present a significant risk.

The emissions associated with these drilling operations may result in short-term deterioration of local air quality within the vicinity of the well location, however, in the exposed conditions that prevail offshore, these emissions are expected to disperse rapidly such that emissions from the vessels are not considered to have a significant impact. CO2e emissions from the operation of the rig and support vessels is estimated to be 22,528 tonnes which represents 0.114% of the emissions associated with UK offshore activities annually.

There are no expected transboundary effects from the planned drilling operations at the Machar Development. The nearest boundary (UK/Norway Median Line) is located approximately 39 km west of the operations.

Although not a planned activity, a worst-case major accident scenario resulting from a potential well blow-out was modelled and assessed. 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 that could have a significant impact and the proposed operations carried out as planned are not likely to have a significant effect on the environment.

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 MUR-SD well is not likely to have a significant impact on other offshore activities or other users of the sea and nocumulative 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