

Our Ref: 01.01.01.01-6444U
UKOP Doc Ref:1373920



Offshore Petroleum Regulator
for Environment & Decommissioning

REPSOL RESOURCES UK LIMITED
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Registered No.: 00825828

Date: 5th December 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
PIPER, WELL 15/17-R915/17-B18**

A screening direction for the project detailed in your application, reference DR/2523/0 (Version 2), dated 19th November 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



**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**

PIPER, WELL 15/17-R915/17-B18

DR/2523/0 (Version 2)

Whereas REPSOL RESOURCES UK LIMITED has made an application dated 19th 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/16679/0/GS/1)**.

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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 6 December 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

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

- Drilling of the 15/17- R9 gas producer well by sidetracking from the 15/17 - B18 donor well from the Piper platform.
- 8.5" Sections to be drilled with Low Toxicity Oil-Based Mud (LTOBM).
- Contingency options of slot recovery, 12.5" section and 8.5" section
- Well completion
- Wellbore clean-up

(WONS/16679/0/GS/1)



Description of the Project

The proposed drilling project is located in the Piper B field in the Central North Sea, in UKCS Block 15/17, approximately 155 kilometres (km) from the Aberdeenshire coastline, and 72 km from the UK/Norway Median Line, in a depth of approximately 146 metres (m). The R9 well will be drilled by sidetracking the existing B18 donor well from the Piper platform. The well is to be drilled using Water Based Mud (WBM) which will be discharged to sea.

Following abandonment of the B18 well if the existing production casing is found to be suitable for re-use then the well will be sidetracked. If the existing production casing is not suitable for reuse, a slot recovery will be undertaken and a contingency 8.5" section will be drilled, if wellbore stability arise this 8.5" section can be reduced to a 6" section. The well will be completed for production. It is estimated that the project will take upto 62 days between 6 December 2024 and 31 July 2025.

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

The Piper platform from where the R9 well will be drilled is in the central North Sea (CNS) in United Kingdom Continental Shelf (UKCS) Block 15/17, approximately 155km northeast of the Scottish coastline and 72 km from the United Kingdom in approximately 146 m water depth Lowest Astronomical Tide (LAT). Residual currents at Piper range 0.25 m/s - 0.5 m/s. In the vicinity of the Piper platform, the annual mean significant wave height is 2.32 m.

The sediment in the wider platform area includes sand, gravel and muds, the latter forming the seabeds of the Fladen and Witch grounds with pockmarks as well as valleys, trench, boulders and cobbles being remnant features. The Piper sediment is predicted to be deep circalittoral mud with low sand content, confirmed by nearby survey results of the Tweedsmuir pipeline showing a uniform silt and mud with fine sand content being heavily bioturbated by species.

Fauna include polychaetes, bivalves, anemones, crabs and a survey in the vicinity of the platform found a low number of sea pens. There is potential for sea-pens and burrowing megafauna communities (OSPAR listed as threatened or declining) and the Priority Marine Features of Ocean quahog and burrowed mud (seapens and burrowing megafauna in circalittoral fine mud) to be present. They have been recorded in areas adjacent to Piper field but not block 15/17 itself.

The proposed operations will coincide with Norway pout and Nephrops spawning and nursery area (unfavourable for cod spawning), there is a low to medium sensitivity for aggregations of anglerfish, haddock, Norway pout, European hake and whiting.



The closest MPA is Central Fladen located 42km to the north west of the platform designated for 'burrowed mud' (also a Priority Marine Feature) with species of sea pen and for the sub-glacial tunnel valley of the Fladen Deep. The project is in the National Marine Plan Area for Scotland.

The closest Annex I habitat is the Scanner Pockmark 44km to the south-east, designated for a submarine structure made by leaking gas but there are no known reefs. Pockmark distribution coincides with the Witch Ground and Flags Formation in which Piper is located. None of the pockmarks surveyed had active gas seeps such as bacterial mats, bubbles and no aggregations of methane-derived authigenic carbonates.

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 Piper platform ranges from low to very 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.

There are several oil and gas fields nearby including the closest being Saltire (6.8km) and Tartan (14.5 km) both in cessation of production. 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. There are no known wrecks of historical importance within the vicinity of the proposed operations although there are a number of wrecks or obstructions within 10km of the platform. Shipping density in the area is moderate, however drilling will be undertaken in a statutory safety exclusion zone.

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 Piper platform is located within a 500 m safety zone. Shipping in the area is also expected to be moderate. 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.

The main receptor impacted by seabed disturbance will be the benthic communities from cuttings deposition. Physical disturbance can cause mortality or displacement of benthic species in the impacted zone. Based on cuttings discharge modelling, deposition of cuttings is expected to at a depth of 6.5mm covering an area of 0.027 km² at the end of the drilling operation. The impacts of drilling discharges on water quality and benthic fauna is predicted to be minimal as affects will be localised and short-lived. Moreover, given that recovery of the seabed and the associated benthic communities is likely to begin once drilling has been completed, the environmental impact of the discharged cuttings can be considered not significant.

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 well will be perforated using small explosive charges. These will be detonated between 3256m and 3,398m below the seabed and are therefore not expected to cause any noise impacts in the surrounding environment.

The proposed drilling operation is being undertaken at the Piper platform using existing power generation equipment. Atmospheric emissions are regulated under the platforms PPC and ETS Permits. 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 (0.015) 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 R9 well due to the localised and temporary nature of the impacts and the 72 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.

The well is a production well, and an assessment has been included within the project proposal to assess as a worst case, a well blow out within the Piper field. 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. The nearest boundary (UK/Norwegian median) is located approximately 72km from the well location, procedures are in place to minimise the effects of an oil release should the scenario arise. Therefore, any transboundary effects are considered not significant.



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