

Our Ref: 01.01.01.01-6039U
UKOP Doc Ref:1376283



Offshore Petroleum Regulator
for Environment & Decommissioning

REPSOL RESOURCES UK LIMITED
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Registered No.: 00825828

Date: 19th December 2024

Department for Energy Security &
Net Zero

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Tel [REDACTED]

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Dear Sir / Madam

**THE OFFSHORE OIL AND GAS EXPLORATION, PRODUCTION, UNLOADING
AND STORAGE (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS
2020
CLAYMORE - PLATFORM WELL 14/19-C91 (CFC) (Sidetrack to well C80)**

I refer to your amended application dated 18th December 2024, reference DR/2455/1 (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 - PLATFORM WELL 14/19-C91 (CFC) (Sidetrack to well C80)

DR/2455/1 (Version 2)

Whereas REPSOL RESOURCES UK LIMITED has made an application dated 18th December 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/16282/0/GS/1 V2.

Effective Date: 19th December 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 June 2024 until 30 June 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:

DR/2455/1 (Version 2) - 19th May 2024

Please review information in section 5.2.4. (Table 5.3) to ensure all appropriate designated sites are identified with the correct designated features / species / habitats. A variation to the permit should be raised before 31st January 2025 to address this.

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]



1) Decision reasons

The following provides a summary of the assessment 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 has 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 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

DR/2245/1 (Version 2) - 19th December 2024

Application to extend date of operation to 30th June 2025;

Confirmation of well name as C-91 (CFC);

Additional environmental survey data added;

Updates to Major Environmental Incident (MEI) assessment and accidental events section;

Slight reduction in cuttings volume now expected;

Update provided on cement trial;

Updated atmospheric emissions assessment due to date extension.

The following assessment record has been updated where appropriate and remains valid.



Summary of the Project

- Drilling of Claymore C-91 (CFC) well (sidetrack from the donor 14/19-C80 platform well)
- Slot recovery using a Water Based Mud (WBM) system
- Drilling of 8 1/2" section (reduction to 6" for some of its length if required) using a Low Toxicity Oil Based Mud (LTOBM)
- Testing of the Cement unit if not already completed under CP/3089/0 or CP/2906/0.(DR/2245/1 (Version 2)) confirmed that a cement trial was performed on 26th November 2024 and therefore no further trial of the cement unit is permitted).
- Cementing of the well
- Well bore clean-out operation.

OGA (NSTA) consent application ref: WONS/16282/0/GS/1 V2

Description of the Project

This project involves drilling a side track (C-91(CFC))to the existing 14/19-C80 well from the Claymore platform. No MODU will be utilised and there is an existing surface 500m safety zone and a dedicated ERRV in operation.

The original project was estimated to take up to 95 days between June 2024 and end of December 2024 to account for operational delays. The DR/2245/1 (Version 2) application confirmed that work did not commence until 14th November 2024 and is now expected to take a further 60 days to complete. The side track will be drilled as an 8 "section with a contingency to reduce some of the length to 6" inch dependent on the stability of the wellbore. Clean-up fluid returns to the platform will be discharged to sea,if within oil in water specification,via the produced water system or directly discharged in the event the produced water system is unavailable. No significant 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. It should be noted that the well is drilled as a water injection well.

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. There is one synthetic oil waste streams resulting from the project which will be discharged to sea and will quickly disperse in the offshore waters and the minor base oil content would be rapidly broken down through the natural biodegradation process.



Location of the Project

Having regard 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 is in an offshore oil and gas licenced area, approximately 130 km east from the Aberdeen coastline in Scotland and 102 km west of the UK/Norway median line, in an area where water depth is approximately 111 m, and the seabed type is broadly characterised as offshore circalittoral mud. Water circulation in the project location is driven by the influx of North Atlantic waters through the Fair Isle Channel moving southwards along the Scottish coast. Within the region, the mean significant wave height is 2.32 m.

The project location is not within any protected areas, with the closest UK area, the Central Fladen Nature Conservation Marine Protected Area (ncMPA), designated for the protection of features such as burrowed mud (sea pens and burrowing megafauna and tall sea pen components) and sub-glacial tunnel valley representative of the Fladen Deeps. This ncMPA is approximately located 43 km away.

The epifauna observed in the survey area were dominated by polychaetes.

The project works and timing will take place at a time when a number of fish species may be found to use the area as spawning, juvenile or nursery locations. Sightings of cetaceans are most common in the months of May and December. Seals are not expected to be seen at the remote location. Seabirds are most common in the area during the months of May and June. The project area is used for fishing, but will occur from an existing platform with a 500m safety zone hence is not expecting to impact fishing industry. The surrounding area comprises other oil and gas infrastructure, with the closest development within 19 km. The closest renewable energy project is located ca 23 km from the platform and is not expected to be impacted. There are no Marine aggregates licences nor any wrecks that are scheduled monuments or Historic Marine Protected Area within 40 km of the platform.

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 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 operation will occur from Claymore platform that has been in situ since 1976 and is surrounded by a 500 m safety zone for which vessels are not allowed to enter hence it would not be expected that shipping in the area would be significantly impacted by the drilling operations at the platform.

There is not expected to be significant seabed impact as the drilling operations are to be carried out from the Claymore platform and no additional drilling rig is required. The initial slot recovery at the well be undertaken using WBM which will be discharged overboard. The well section is to be drilled using LTOBM with all cuttings contained and therefore zero discharge to the seabed. Any discharge to sea following on from the operations are expected to disperse and biodegrade rapidly and are therefore not expected to have significant effect on the marine environment.

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.

Emissions to air will occur from combustion plant used on the platform and support vessels. The quantity of carbon dioxide equivalent from the drilling of this well and support vessel use amounts to 0.0097% of the 2022 total emissions from offshore oil and gas activity. The drilling and support vessel emissions will not have a detrimental effect to local air quality over the long-term, nor are they expected to inhibit the ability to reach wider climate change goals. The environmental effects from emissions to air are not expected to have a significant impact on the environment. The impact of the vessel emissions will be mitigated by optimising vessel efficiency (i.e. minimising the number of vessels used and vessel trips required to achieve the project deliverables) and hence minimising fuel use and avoiding the unnecessary operation of power generation / combustion equipment.

In the event that an unlikely and unplanned accidental spill scenario from a well blow-out was realised the volume of oil that would be released from well 14/19-C80 has been estimated at 48m³/day. The DR/2245/1 (Version 2) application confirms that the C-19 (CFC) well is a sidetrack to the C80 well and that the volume of released oil would be the same. This would not expect to lead to a major environmental incident. All drilling activities will be carried out in accordance with the Offshore Safety Directive as per Repsol's Well Examination Scheme and Guidance Document. An approved Oil Pollution Emergency Plan to manage hydrocarbon releases will be in place prior to activities being undertaken.

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