

Our Ref: 01.01.01.01-5805U
UKOP Doc Ref:1376459



Offshore Petroleum Regulator
for Environment & Decommissioning

BP EXPLORATION OPERATING COMPANY LIMITED
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Registered No.: 00305943

Date: 20th 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
SCHIEHALLION, 204/25a- WPX1410 planned well**

I refer to your amended application dated 29th November 2024, reference DR/2414/4 (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



**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**

SCHIEHALLION, 204/25a- WPX1410 planned well

DR/2414/4 (Version 2)

Whereas BP EXPLORATION OPERATING COMPANY LIMITED has made an application dated 29th 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/16111/0/IDA/1 Version 1, WONS/16111/1/C/1 and WONS/15660/0/PIDA/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 11 October 2023 until 31 March 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 Monitoring

A post drill ROV seabed survey is required to be conducted within 6 months of the removal of anchor chains along the anchor corridors.

6 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.

7 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.

8 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).

9 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 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

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:

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

DR/2414/4 - change of project to anchor the Ocean Great White MODU, drill production well 204/20-W24 (PX1410) to target depth, run completions and to include the use of Treatment of 12.25 and 8.5 inch LTOBM cuttings using the iNOVatherm portable treatment unit. It also includes contingency respu and Can-ductor.

DR/2414/3 - update for installation of wellhead, spud date change and date extension

DR/2414/2

Change of project to account for the drilling of the 26" top hole section of Production well PX1410.

DR/2414/1

This variation was to add a description of the use of installation aids and their associated temporary seabed disturbance. Inclusion of temporary workbaskets, DP beacons and guidepost on top of CAN-ductors.



DR/2414/0

- CAN-ductor installation at well

Summary of the change to the project

This post direction amendment is for the locating of the anchors for the Ocean Great White MODU and drilling the lower sections of PX1410 with LOBM. The cuttings will be returned to the rig for treatment using iNOVatherm portable treatment unit.

Summary of the Project

CAN-ductor installation at well PX1410;

Drilling of the 26" section with seawater sweeps and Water based mud(WBM);

Drilling of the 17.5" section with WBM;

Drilling 12.25" section using low toxicity oil based mud (LTOBM) cuttings to be treated by iNOVaTHERM Portable Treatment Unit

Drilling of the 8.5" section using low toxicity oil based mud (LTOBM) cuttings to be treated by iNOVaTHERM Portable Treatment Unit

Contingency CAN-ductor and respud for the well

Well clean up and completion

Description of the Project

The previous screening directions (DR/2414/0 and DR/2414/1) related to the installation, by suction piling into the seabed at the PX1410 well location. This infrastructure was pre-installed for future drilling of the well.

The PX1410 well will be drilled from the Ocean Great White semi-submersible mobile offshore drilling unit (MODU). The well will be drilled using seawater sweeps, WBM and LTOBM with sweeps discharged at the seabed, WBM and WBM cuttings will be discharged at the seabed and the surface from the MODU. The 26" section will be drilled with the Ocean Great White on Dynamic positioning. The 12.25 and the 8.5 inch sections will be drilled with LTOBM with the mud and the cuttings returns will be treated via using iNOVatherm portable treatment unit. Once the LTOBM cuttings have been treated, they will be rehydrated to create a slurry and will be discharged along with the drill cuttings clean-up fluids, to sea, with the recovered base oil reused in drilling muds. The discharges will be subject to an approved sampling regimes. If issues are encountered with the treatment unit then LTOBM cuttings will be skipped and shipped to shore for treatment. If issues are encountered with the treatment unit then LTOBM cuttings will be skipped and shipped to shore for treatment and



disposal. A contingency re-spud and CAN-ductor have been included in the assessment.

Once the lower well sections (12.25" and 8.5") have been drilled, casings will be run, and cement will be used to provide integrity of the well. On completion of the drilling operations, wellbore clean-up operations will be undertaken. The well will be suspended post completion.

The wellhead will be installed by the Ocean Great White rig and the Xmas tree will be installed at a later date. The drilling and completions operations are expected to take 77 days.

The cumulative impact of operations of drilling phase A, phase A+ Schiehallion wellhead removal operations and subsea tie-in and commissioning activities is not considered to be significant with a worst case impact area constituting 0.0041% of the Faroe-Shetland Sponge Belt NCMFA.

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 project is located in the Schiehallion field, West of Shetland (WoS), in UKCS Block 204/20, approximately 129 kilometres (km) to the west of the Scottish coastline, and 35 km to the east of the UK-Faroes median line, in a depth of approximately 378 metres.

Sediments in Block 204/20 are best described as the (EUNIS) habitat A5.4 'sublittoral mixed sediments they comprise primarily of gravelly muddy sand and muddy sandy gravel, with a smaller area of slightly gravelly sandy mud (which is the sediment type found in the area of the PX1410 well). A characterisation survey of the surrounding area has been conducted and the nearest station to well PX1410 (station SW) was further classified as EUNIS biotope A5.451 ' *Polychaete-rich Deep Venus community in offshore mixed sediments*', this habitat is noted as being a diverse community rich in polychaetes with a significant venerid bivalve component'.

The mean significant wave height in the area is expected to be up to 3m, however due to the depth of water, wave energy at the seabed is expected to be negligible. Currents in the area are complex with surface currents driven by south westerly winds and deeper colder currents flowing southwest at a depth of approximately



450m. The residual seabed flow is 0/1 m/s.

The fauna observed across the survey area are regularly observed within the North East Atlantic area. The worksite lies within the Faroe-Shetland Sponge Belt Nature Conservation Marine Protected Area (NCMPA). One of the designated features of this site is the OSPAR defined habitat, 'deep sea sponge aggregations'. Characterisation surveys of the area around the PX1410 planned well (undertaken in 2021) identified occasional sponges at all of the stations visited, although most of these did not display the high densities that are representative of sponge aggregations. Of the 17 stations visited, only 3 displayed the high densities characteristic of the OSPAR sponge aggregation habitat. The closest of the survey stations to the drill centre was 500m away (station SW), at this site sponge densities here were low, with fewer than ten images showing between 1 - 5% sponge cover, the remaining images showed no sponges. A semi-quantitative sponge assessment was undertaken for the mooring chains in 2024 which found potential sponge aggregations along 11% of the total length of mooring chains. The overall total disturbance of all the eight mooring chains is 0.019km², of which 0.0025km² has potential sponge aggregations.

Another designated feature of the NCMPA is ocean quahog (PMF). The nearest known aggregations of ocean quahog are located in the north of block 204/ 25, which is located approximately <1km south from the planned PX1410 well. No live individuals were observed in the recent characterisation survey, however empty shells were observed. It is not likely that ocean quahog will be found within the area in any significant numbers or densities.

Characterisation surveys showed that stony reef could be present in the vicinity of the planned PX1410 well however these areas were largely described as having a low-resemblance to stony reef as they didn't show the adequate physical and biological characteristics typical of this habitat. Station SW which is approximately 500m from well site did show images which had a medium resemblance to stony reef but no stations showed a high resemblance to stony reef habitat.

No fluid seep areas or other habitats of conservation significance were recorded in the survey area.

Bottlenose dolphins, harbour porpoise and white beaked dolphins were observed, in low densities in the WoS area. Seabird vulnerability in Block 204/20 is low in February, March and Medium in April. The proposed operations will coincide with fish spawning and/or nursery activity for a number of species.

There are a number of different seabed users which are active in the region. The nearest marine cable is 10.77 km away. There are no aggregate dredging, disposal sites, sites of marine archaeological interests, planned offshore renewable energy developments or recreational sailing routes identified within 40km of the operation. Shipping density in the area is low.

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 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 majority of the project is located within the existing 500m safety exclusion zones of the Schiehallion West Drill Center or the Ocean Great White 500 m exclusion zone which excludes unauthorised access of vessels and prohibits access to fishing vessels. The mooring chains will extend beyond the 500 m safety zone, mitigation measures including kingfisher notifications will be conducted to reduce collision risk for other sea users.

The proposed operations are located within the Faroe-Shetland Sponge Belt NCMFA. This site is designated for deep-sea sponge aggregations, offshore subtidal sands and gravels, ocean quahog, continental slope, channels and iceberg plough-marks and sand waves. The overall size of the protected site is 5,278 km².

The project will result in a seabed disturbance of 0.026km². Drill cutting modelling has been undertaken to assess the extent of seabed disturbance. As this change of project only accounts for the 26" top hole section, the impact is limited to a localised area of 2 - 4m around the drill string with a maximum thickness of 91.78mm, decreasing to less than 1mm at a distance of 0.14km. Drill cuttings for the 17.5 section will be discharged into the water column. The discharge will result in a temporary effluent plume containing drill cuttings. WBM and cuttings are expected to dissolve, dissociate and disperse during settlement through the water column. The duration of the planned discharges is limited. The 12 " and 8 " sections will be drilled using LTOBM and a maximum of 933,920 kg (including contingency) of solids will be generated which will be returned to the rig for treatment using an iNOVaTHERM unit. Modelling was conducted to assess the potential impacts of using an iNOVaTHERM unit from the Ocean Great White (bp, 2024). Taking into account the worst-case cuttings values (including the contingency sections) the modelling study found that the sediment EIF was zero (<5% risk), i.e. there was no significant change in the sediment structure caused by burial, grain size change, or oxygen depletion in the sediment.

The modelling simulations suggest that treated drill solids are deposited in a very thin layer (0.001 to 0.1 mm), with no sediment deposition thicknesses > 0.1 mm, and



therefore unlikely to be detected by visual inspection.

A semi-quantitative sponge assessment was undertaken for the mooring chains in 2024 which found potential sponge aggregations along 11% of the total length of all the mooring chains combined. The overall total disturbance of all the eight mooring chains is 0.019 km², of which 0.0025 km² has potential sponge aggregations. Whilst localised impact to sponge aggregations are anticipated the overall impact to the protected site for sponge aggregations equates to 0.0000004% of the Faroe-Shetland sponge belt NCMPA. It is therefore concluded that this will not effect the population level of sponges or the integrity of the conservation objections of the NCMPA. As the proposed total operations will impact an estimated 0.026 km² of the seabed, it is expected that < 0.0005% of the NCMPA will be impacted.

The cumulative impact of completed operations of drilling phase A, Schiehallion wellhead removal and the already approved operations of drilling phase A+, subsea tie-in and commissioning activities is not considered to be significant with a worst case impact area constituting 0.0041% of the Faroe-Shetland Sponge Belt NCMPA. Therefore the total impact of all combined operations represents a small increase in the total area of anthropogenic disturbance to the NCMPA. Given the extent of habitat disturbance at Schiehallion in relation to the size of the NCMPA, it is not expected that this will have a significant cumulative impact on the integrity of the designated features or the conservation objectives of the NCMPA.

Atmospheric emissions from the vessel are expected to be short lived and likely to be negligible relative to the total emissions associated with shipping and offshore hydrocarbon production. These are expected to rapidly disperse and are not likely to have a significant impact.

There are no expected transboundary effects from the project. The nearest boundary (Faroes median line) is located approximately 35km 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 project is in accordance with the National Marine Plan for Scotland's objectives and policies. It is considered that the installation of the project at the PX1410 planned well location is not likely to have a significant impact on other offshore activities or other users of the sea.

2. 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