

Our Ref: 01.01.01.01-6522U
UKOP Doc Ref:1378898



Offshore Petroleum Regulator
for Environment & Decommissioning

REPSOL RESOURCES UK LIMITED
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UNITED KINGDOM
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Registered No.: 00825828

Date: 16th January 2025

Department for Energy Security &
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Crimon Place
Aberdeen
AB10 1BJ

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Dear Sir / Madam

**THE OFFSHORE OIL AND GAS EXPLORATION, PRODUCTION, UNLOADING
AND STORAGE (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS
2020
CLAYMORE, WELL 14/19-C90 (Completion)**

A screening direction for the project detailed in your application, reference DR/2539/0 (Version 2), dated 12th January 2025 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**

CLAYMORE, WELL 14/19-C90 (Completion)

DR/2539/0 (Version 2)

Whereas REPSOL RESOURCES UK LIMITED has made an application dated 12th January 2025, 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/15125/1/C/1 Version 1.

Effective Date: 16th January 2025

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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 16 January 2025 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/2539/0 (Version 2) - 16th January 2025

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. An application for a change to the project should be raised before 28th February 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 Project

- Completion of the Claymore C-90 platform well;
- Abandonment of the well using cement in the event of an unsuccessful case;
- Well bore clean-up operation.

OGA (NSTA) consent application ref: WONS/15125/1/C/1 (Version 1).

Description of the Project

This project involves completion only of the C90 oil producing well from the Claymore platform. Drilling and completion activities were previously assessed under DRA/951 (DR/2295/3), however, completion activities were not undertaken and the permit expired on 31st July 2024. This application concerns the completion only of the well. No MODU will be utilised and no drilling will take place. There is an existing surface 500m safety zone around the Claymore platform.

Completion activities are anticipated to take 25 days. Contamination of existing wellbore fluids is not anticipated as the well was not previously perforated and currently contains treated seawater. A clean-up is proposed where fluid returns from



the well will be discharged to sea, if within oil in water specification, or via the produced water system if not within specification. A direct overboard discharge is included in the permit in the event the produced water system is unavailable. In the unlikely event that fluids visibly contaminated with reservoir hydrocarbons are observed, these will be skipped and shipped to shore for appropriate disposal. There will be no discharge of synthetic hydrocarbons as part of this operation. Following the well bore clean up, the drill pipe will be displaced to base oil to reduce the likelihood of H₂S formation. This base oil will not be discharged and will flow back to the production process once the well is perforated. An inflow test is proposed prior to the completion being run and Xmas tree being installed. The Xmas tree voids will also be filled with base oil to prevent future hydrate formation and this base oil will also be routed to the production process and will not be discharged.

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.

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

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 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 June. Seals are not expected to be seen at the remote location. Seabirds are also most common in the area during the months of May and June. The project area is used for fishing, but the completion operation 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, 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 completion operations at the platform.

There is not expected to be significant seabed impact as no drilling or discharge of cuttings is proposed. Completion activities are to be carried out from the Claymore platform and no additional drilling rig is required. Any discharge to sea of reservoir hydrocarbons as a result of wellbore clean-up 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 well completion activities. 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 associated with the support vessel and helicopter use amounts to 0.004% of the 2022 total emissions from offshore oil and gas activity. The support vessel and helicopter 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 additional vessel / helicopter emissions will be mitigated by optimising efficiency (i.e. minimising the number of vessels / helicopters used and number of 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-C90 has been estimated at up to 2,264.1m³/day. A well blow out from this well is assessed as having the potential to represent a Major Environmental Incident. Completion 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