Our Ref: 01.01.01.01-6538U
UKOP Doc Ref:1387424

Offshore Petroleum Regulator
for Environment & Decommissioning

PETROFAC FACILITIES MANAGEMENT LIMITED
BRIDGE VIEW
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ABERDEEN
AB11 5QF

Registered No.: SC075047

Date: 18th March 2025

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
Drilling 21/30f-B21/30f-BE01 planned well at Belinda field

A screening direction for the project detailed in your application, reference DR/2541/0 (Version 3), dated 12th March 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] or email the [redacted] at [redacted]

Yours faithfully

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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

Drilling 21/30f-B21/30f-BE01 planned well at Belinda field

DR/2541/0 (Version 3)

Whereas PETROFAC FACILITIES MANAGEMENT LIMITED has made an application dated 12th March 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/17104/0/IDA/1 and WONS/17353/0/C/1.

Effective Date: 18th March 2025

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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 18 March 2025 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:

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]

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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 assessment undertaken 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 single production well, Well 21/30f-BE01 from the COSL Innovator held in place with anchors and chains, with a new 500 m exclusion zone around the well location. The well is to be tied back to the Triton FPSO via a rigid export pipeline. A flexible control umbilical routed from the nearby Evelyn field will provide power and chemicals.

The project is expected to take 18 weeks, commencing in March 2025

The well will be drilled in 4 sections: 42" x 36" x 26", 17 ", 12 " and 9 " x 8 " sections. The first 2 sections will use water based mud (WBM) and the latter 2 sections will use oil based mud (OBM).

The WBM section drill cuttings will be deposited on the seabed directly around the well, with an expected disturbance area of 282,740 m2. The OBM will be skipped and

shipped to shore

Cementing of the well and wellbore clean up and testing operations.

OGA (NSTA) consent application ref: WONS/17104/0/IDA/1; WONS/17353/0/C/1

Description of project

This project covers the drilling of a production well 21/30f-BE01 in the Belinda field, to be tied back to the Triton FPSO, using the COSL Innovator, a mobile semi-submersible drilling rig. The COSL Innovator will be kept in place using an eight-point mooring system with anchors and chains, using an anchor handling vessel. There is a possibility that piggyback anchors may also be required. A 500 m exclusion zone will be enforced with a standby vessel. The mooring system is anticipated to have a footprint of 77,465 m2. A transponder beacon will be used to support rig positioning, as well as well markers and an acoustic logging device, with a total footprint of 4.9 m2. Finally, a vertical xmas tree, footprint of 0.072 m2, making the combined total seabed disturbance of 0.077 km2 for both permanent and temporary disturbances.

The well will be drilled in 4 sections: 42" x 36" x 26", 17 ", 12 " and 9 " x 8 " sections. It is planned as a single horizontal subsea well targeting the Tay sandstone. The 500 m exclusion zone will remain in place once the operations have been completed for the long term presence of the xmas tree. The proposed well location is in an area which is already heavily developed region for oil and gas.

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 Belinda field is located 170 km west of the Scottish mainland and 85 km north-east of the UK/Norwegian transboundary line in Block 21/30f. The project is in an area characterised by typical muddy sand or sandy mud with a water depth of 96.7 m. The annual mean significant wave height is 2.14 m and an average wind speed of 11 m/s.

A site specific survey carried out in 2024 found of homogenous fine sediment characterised as fine to very fine sand with some shell fragments and occasional coarser substrates. Macrofaunal analysis of grab samples acquired around the

proposed Belinda well location indicated that the macrofaunal community is characterised by annelids, particularly *Paramphinome jeffreysii* and *Galathowenia* sp. The most frequently observed epifauna included seapens, hermit crabs and anemones, although these were sparsely distributed and did not represent high quality examples of this habitat in relation to the SACFOR scale. No adult ocean quahogs (*Arctica islandica*) were recorded from any of the grab samples acquired based on visual inspection of the recovered grabs and subsequent laboratory-based analysis. Hydrocarbon analysis recorded that the total hydrocarbon content (THC) values around the proposed Belinda well location ranged from 10.8 to 15.3 g/g, with a mean of 13.3 g/g. It is not likely that a significant impact would occur to the benthos in the area due to the operations.

During the site survey two seabed depressions were found ~1 and ~1.6 km from the Belinda location, further investigation did not identify any Annex I - submarine structures made by leaking gases (pockmarks) habitat. There were no other Annex I habitats recorded in the vicinity of the proposed well.

The nearest protected area to the proposed well location is the East of Gannet and Montrose Fields NCMPA which is 6.5 km southwest of the well location. This site is designed to protect representative offshore deep sea muds habitat and ocean quahog aggregations, including sands and gravels as their supporting habitat. The well location is also within a number of fish species spawning and nursery grounds including a high intensity spawning area for sandeels and cod. There are a number of PMF fish species expected in the area including, herring, mackerel, monkfish, Norway pout, sandeels and cod. There is a period of concern in the block for herring spawning and seismic activity during May - August. It is unlikely there would be a significant impact to fish in the area due to the operations.

Marine mammals including Minke whale, white-beaked and white-sided dolphin and Harbour porpoise are generally expected in low density within the area during the operations, with a moderate density in May for white-beaked dolphin and harbour porpoise and also September for harbour porpoise. The seabird oil sensitivity is low in the area throughout the year. It is unlikely that a significant impact to both marine mammals and seabirds in the area would occur due to the operations.

Fishing activity is low in the area, as is commercial shipping, demersal landings and value for the ICES rectangle 43FO were 233 tonnes and £207,021 respectively for 2022. The Belinda field is located in a heavily developed region for oil and gas, with the Triton FPSO 4.8 km northwest. There is a wind farm lease site 40 km northwest of the Belinda well location and another 42 km southwest. The North Sea Link power cable runs ~29 km southeast. There are no historic wreaks in the vicinity and no military activity. It is not likely that any other users of the sea would be significantly impacted due to the operations.

Given the location of the project, it is not likely that the areas identified at paragraphs 2(c)(i), (iii), (iv), (vi), (vii) or (viii) 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, noise, 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.

There will be a temporary 500 m safety exclusion zone surrounding the COSL Innovator during the drilling activities, excluding unauthorised access of vessels and prohibiting access to fishing vessels. A standby vessel will also be on site throughout rig operations to help enforce this zone. The COSL Innovator semi-sub will be held in place with an eight-point mooring system with anchor and chains. All appropriate notifications to mariners will be made prior to the well drilling activities commencing. Given that the appraisal well is in an area considered to be of low importance to the UK fishing industry, in an area which does not experience high shipping density, and the drilling campaign is of a relativity short duration, any impacts on other sea users is not considered to be significant.

Seabed impacts of 0.077 km2 are expected to be impacted in total from the mooring system including anchors and ground chains, a transponder beacon, well markers and an acoustic logging device, with only 0.072 m2 of this permanent due to the placement of the xmas tree and the rest temporary. In addition, seabed disturbance will occur from the discharge of WBM drill cuttings for the top two well sections. Site specific drill cuttings modelling was not undertaken, however, the disturbance is estimated to be limited to 50 m surrounding the well based on information for similar wells from the SERPENT monitoring programme. This could result in the smothering and mortality of benthic fauna which will result in some short-term temporary impacts however the benthic communities are expected to regenerate the area impacted by drill cuttings over time and therefore the impacts from seabed disturbance have been assessed as not likely to have significant effect.

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.

There are no underwater noise impacts anticipated due to the operations.

There are no transboundary impacts expected due to the localised nature of the operations. Atmospheric emissions will arise from the use of the COSL Innovator, support vessels including anchor handlers, supply, standby and guard vessels and helicopters. During the final well test fluids flowed to the surface will be routed through the well test package where the hydrocarbons will be separated and flared off. The total GWP of the proposed operations including all support vessels and well

test flaring (24,923.84 tonnes of CO2 equivalents of which 7,805 tonnes are during the well test) represents only 0.17% of the total GWP of exploration and production operations in 2022. 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.

The well to be drilled is a development well, and an assessment has been included within the project proposal to assess as a worst case, an uncontrolled well blow out from the Belinda field, and the subsequent potential for a Major Environmental Incident (MEI). The assessment concluded that there is a potential for an MEI to occur, however the risk of an oil spill event as a result of a well blow out from well 12/30f-BE01 is minimal, and the developer has suitable mitigation in place to prevent such an occurrence. 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 do not contradict any of the Scottish marine plan objectives and policies.

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