

Our Ref: 01.01.01.01-6360U
UKOP Doc Ref:1388474



Offshore Petroleum Regulator
for Environment & Decommissioning

ITHACA (NE) E&P LIMITED
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Registered No.: 01483021

Date: 25th March 2025

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**

CYGNUS, 44/12a-AAF planned well

A screening direction for the project detailed in your application, reference DR/2500/3 (Version 2), dated 21st 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] 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**

CYGNUS, 44/12a-AAF planned well

DR/2500/3 (Version 2)

Whereas ITHACA (NE) E&P LIMITED has made an application dated 21st 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 applications WONS/17016/0/PIDA/1 Version 1, WONS/17152/0/IDA/1 Version 1, WONS/17152/0/GS/1 Version 1, WONS/17152/0/C/1 Version 1 and WONS/17434/0/WT/1 Version 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 1 November 2024 until 31 December 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 Mitigation measures

a) Conductor driving operations must be undertaken in accordance with the current JNCC 2010 'Statutory nature conservation agency protocol for minimising the risk of injury to marine mammals from piling noise'.

b) The pre-conductor driving search and soft start should be timed to occur during hours of daylight/good visibility to allow a marine mammal observer (MMO) to observe for any marine mammals within 500m of the sound source, and if necessary, delay the soft start if animals are detected within this zone.

c) As a minimum, one dedicated MMO should be used. They should be fully trained and not have a dual role onboard (for example, in addition to being an MMO also work as a Fisheries Liaison Officer (FLO)).

d) A proven PAM system, i.e. one that has been successfully demonstrated to be able to detect vocalising marine mammals, must be available on the jack-up rig or the Cygnus Alpha Wellhead Platform to undertake acoustic monitoring if any search or soft start procedure is undertaken during periods when visual observations are not effective because of the weather conditions or sea state. Conductor driving operations must be delayed if it is not possible to undertake the acoustic monitoring during the relevant periods. (Further information can be found in the JNCC guidelines).

e) PAM operatives must be familiar with acoustic monitoring techniques and the requirements of the JNCC guidelines and reporting forms. (Further information can be found in the JNCC guidelines).

f) The applicant must inform OPRED within two days of the commencement and then completion of the proposed operations.

g) At the end of the conductor driving operations, a report (indicating the OPRED reference number) should be sent to the JNCC. This report should detail the soft start procedures, any visual observations/PAM detections and include the Marine Mammal Recording Forms (i.e. the excel spreadsheet) in its original format (i.e. not converted to a pdf). Any difficulties encountered, or recommendations that may be of use for future work should be included within the report.

h) A conductor driving close-out report must be made directly through the UK Marine Noise Registry (<https://mnr.jncc.gov.uk/>) within 12 weeks of the date of expiry of the Screening Direction. If the conductor driving operation is cancelled for any reason, a close-out report must still be submitted to confirm that conductor driving was not undertaken.

i) Conductor driving operations shall be completed by the 30th of April 2025. If operations are going to take place from 1st May 2025 onwards, a variation to this



Screening Direction will have to be submitted and approved before conductor driving operations can commence.

j) Conductor driving activities must not commence within the Southern North Sea (SNS) SAC or within 15 km of the boundary of the SNS SAC until it has been confirmed, after consulting all other parties undertaking impulsive noise operations on that day in the SNS SAC, that the accumulated disturbance from activities for that day will not exceed 20% of the area of the SNS SAC.

k) For each day that the conductor driving is undertaken within the Southern North Sea SAC, or within 15 km of the SNS SAC site boundary, the following must be reported:

- a list of the other projects that operated on that day that generated impulsive noise operations where the relevant EDR shows an overlap with the the SNS SAC and;
- the daily percentage of the SNS SAC that was subject to disturbance from this conductor driving activity in combination with other projects as mentioned in k(a) above.

The reporting of this information must be submitted to DESNEZ (OPRED) within the close out report outlined in condition (h) above.

l) Ithaca (NE) E&P Limited must participate in the Summer 2025 Development Co-ordination Forum, including participation in the Simultaneous Operations (SIMOPs) procedure, which is used to co-ordinate projects with noisy activities in the SNS SAC to ensure condition (j) above is met.

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:

DR/2500/3 (Version 2) - 25th March 2025:

(1) Conductor driving cannot continue beyond 30th April 2025.

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

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 Assessment 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

This post screening direction amendment (ref: DR/2500/3) relates to a change to the project for which a screening direction was previously issued.

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 change to the project

The conductor driving operations have been delayed due to prior commitments of the jack-up rig and therefore conductor driving may take place up to 30th of April. The remaining operations are still scheduled up to 31st of December 2025.

Summary of the project

Drilling of the 44/12a-AAF well at the Cygnus Alpha Wellhead Platform from the Valaris Norway jack-up rig in the Southern North Sea. Operations are due to last 160 days.

Conductor driving: a 30" conductor will be driven into the seabed using water-based mud (WBM)

Drilling of the following sections:

26" section using WBM

17.5" and 12.25" sections using low toxicity oil-based mud (LTOBM)

8.5" section pilot hole for data acquisition using LTOBM

8.5" section geological side-track and 6" sections using LTOBM



Contingency mechanical side-track from the 17.5" section with LTOBM as a worst-case
All LTOBM will be skipped and shipped to shore and there will be no discharge to the marine environment
Well completion
Wellbore clean-up operations
Well test which will be less than 96 hours long and combust less than 2,000 tonnes of hydrocarbons

NSTA consent application references:

Conductor driving: WONS/17016/0/PIDA/1 Version 1
Drilling: WONS/17152/0/IDA/1 Version 1
Geological side track: WONS/17152/0/GS/1 Version 1
Well completion: WONS/17152/0/C/1 Version 1
Well test: WONS/17434/0/WT/1 Version 1

Under DR/2500/0, deposition of stabilisation material was applied for. This is no longer required by the operator and therefore excluded from the application.

Description of the project

This project involves drilling a production well (44/12a-AAF) at the Cygnus Alpha Wellhead Platform from the Valaris Norway jack-up rig. The jack-up rig will be accompanied by one anchor handling vessel and two tug vessels. The jack-up rig will be placed initially in a stand-off position and then anchors and anchor chains will be deployed to locate the jack-up rig in its final position.

It is estimated that the project will take up to 160 days between 24th February 2025 and 31st December 2025 to account for operational delays. WBM will be used for conductor driving and drilling the 26" section. WBM cuttings will be returned to the jack-up rig topside and discharged overboard into the marine environment. LTOBM will be used for the drilling all other well sections. LTOBM cuttings will be returned to the jack-up rig topside and will be skipped and shipped to shore for disposal. Casings will be cemented at each drilled section.

Wellbore clean-up operations and a well test will be undertaken following completion of drilling and cementing operations. The well test will take less than 96 hours and less than 2,000 tonnes of condensate will be flared.

The conductor will be driven in batch with three other conductors and a second well will be drilled by the jack-up rig after drilling the 44/12a-AAF well. However, this application covers only the activities associated with the 44/12a-AAF well outlined in the summary of the project above.

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 well is located at the Cygnus field, next to the Cygnus Alpha Wellhead Platform in the Southern North Sea (SNS), in UKCS Block 44/12, approximately 162 kilometres (km) from the UK coastline, and 36 km from the UK/Netherlands Median Line, in a depth of approximately 22 metres (m).

Site specific surveys confirmed that surficial seabed sediments are generally slightly gravelly sand and sand, with a small area of gravelly sand. The wave height in the area ranges from 1.51 to 2.10 m.

The Cygnus field is located within the Dogger Bank Special Area of Conservation (SAC), which is designated due to the presence of the Annex I habitat ' Sandbanks which are slightly covered by seawater all the time ', and the SNS SAC which is designated for harbour porpoise.

Low to moderate densities of harbour porpoise and white-beaked dolphin have been identified throughout the year. Low densities of minke whale and long-finned pilot whale have been recorded in the area throughout the year. The Cygnus field is 162 km offshore and therefore, grey and harbour seals may be encountered in low numbers.

Seabird oil sensitivity in the vicinity of the Cygnus field ranges from low to extremely high throughout the year.

The proposed operations will coincide with fish spawning and/or nursery activity for a number of commercial fish species.

The project area is primarily used for demersal and shellfish fishing and the fishing effort in the area is considered low.

There are several oil and gas fields nearby. The nearest marine cable is less than one kilometre away. The nearest renewable energy site is the Dogger Bank Offshore Wind Farm Project, located 14 km to the northwest. The Eni CCS license reference CS021 is located approximately 15 km east of the proposed operations. There are no known wrecks of historical importance or military activity within the vicinity of the proposed operations. Shipping density in the area is high.

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.

All the proposed activities will take place within the Cygnus Alpha Wellhead Platform 500-m safety zone and therefore impacts to other sea users due to physical presence are not expected.

WBM cuttings generated during conductor driving and drilling of the 26" section will be discharged to the marine environment and settle in close proximity of the well. LTOBM cuttings from the other sections will be returned to the jack-up rig topside and will be skipped and shipped to shore for disposal.

It is estimated that approximately 760.1 tonnes of WBM cuttings will be discharged to the marine environment. The discharge plume released from the WBM cuttings is expected to settle quickly out of the water column and any dissolved contaminants will disperse quickly. This could result in the smothering and mortality of benthic fauna which will result in some short-term temporary impacts. However, benthic communities are expected to regenerate the area impacted by WBM cuttings over time. Therefore, the impacts from seabed disturbance have been assessed as not likely to have significant effect.

There will be a temporary disturbance of the seabed as a result of rig placement (spudcans, anchors and anchor chains) of 0.001924 km² and a permanent disturbance of the seabed as a result of the deposition of WBM cuttings and conductor driving of 0.24077 km². The total area of seabed disturbed resulting from proposed operations will be 0.24269 km², which represents 0.0019% of the Dogger Bank SAC and 0.00066% of the SNS SAC.

The permanent loss of seabed habitat will likely be contained within the 500-m zone of the Cygnus AWHP, which is already impacted by the oil and gas activity taking place within it. Therefore, the loss of this habitat is not expected to have a likely significant effect on neither the SNS SAC nor the Dogger Bank SAC.

In-combination permanent impacts on the Dogger Bank SAC seabed considering other plans and projects are estimated at 0.41% of the area and for the SNS SAC it is estimated at 0.12% of the area. The loss of habitat contributed by this project is considered very small in relation to the available habitat in the sites. The loss of habitat contributed by this project is also considered very small in relation to the combined effect of other projects. As such, significant cumulative impacts arising



from this operation are not expected on the designated sites.

Underwater noise generated from conductor driving is expected to cause a permanent hearing shift in marine mammal hearing up to 33 m from the sound source and a behavioural disturbance up to 319 m from the sound source. The JNCC guidelines "Statutory nature conservation agency protocol for minimising the risk of injury to marine mammals from piling noise" will be adhered to. This includes the use of a marine mammal observer and passive acoustic monitoring. Further, conductor driving operations will be undertaken in coordination with the 2025 underwater noise coordination forum to prevent impacts in the SNS SAC summer area in the summer months. Therefore, any noise generated will not have a significant impact, and it is concluded that this change to the project is not expected to have a likely significant effect on the site in relation to harbour porpoise and its supporting habitat and prey or other marine mammals.

Although not a planned activity, a worst-case major accident scenario resulting from well blowout was modelled and assessed. The probability of a well blowout from the proposed operations is very low. Therefore, it is considered that the control and safety measures in place minimise the risk of a hydrocarbon spill which could have a significant impact and the proposed operations carried out as planned are not likely to have a significant effect on the environment.

Discharge of offshore chemicals associated with the drilling of the well, cementing and completion operations have been assessed as not likely to have a significant effect on the environment. Offshore chemicals associated with LTOBM will be skipped and shipped to shore for disposal.

Atmospheric emissions directly attributable to the planned activities are expected to rapidly disperse and are not likely to have a significant impact.

There are no expected transboundary effects from the operations. The nearest boundary (UK/Netherlands Median Line) is located approximately 36 km of the area of operations.

The cumulative impact arising from drilling the 44/12a-AAF well have been shown to not be significant.

Decision

Taking the above considerations into account, the Secretary of State has concluded that the change to 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

Not Applicable.