

Our Ref: 01.01.01.01-6504U
UKOP Doc Ref:1390737



Offshore Petroleum Regulator
for Environment
& Decommissioning

BP EXPLORATION OPERATING COMPANY LIMITED
CHERTSEY ROAD
SUNBURY ON THAMES
MIDDLESEX
TW16 7BP

Registered No.: 00305943

Date: 4th April 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**

Subsea works Northwest, Central and West drill centres

I refer to your amended application dated 28th March 2025, reference PL/2531/1 (Version 1).

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**

Subsea works Northwest, Central and West drill centres

PL/2531/1 (Version 1)

Whereas BP EXPLORATION OPERATING COMPANY LIMITED has made an application dated 28th 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, PA/5386, PA/5409, PA/5420, PA/5421 and PA/5548.

Effective Date: 4th April 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 1 March 2025 until 28 February 2026.

2 Commencement and completion of the project

The holder of the screening direction must confirm the dates of commencement and completion of the project covered by the screening direction. Notification should be sent by email to the Environmental Management Team Mailbox: opred@energysecurity.gov.uk

3 Nature of stabilisation or protection materials

Grout bags deposits

12.7 tonnes of grout contained within 25 kilogramme capacity bags. (The number of bags deposited should be the minimum required to provide the necessary protection, and any surplus bags must be returned to land).

Concrete mattress deposits

68 concrete mattresses, each measuring 3 metres x 3 metres x 0.3 centimetres. (The number of mattresses deposited should be the minimum required to provide the necessary protection, and any surplus mattresses must be returned to land).

Gabion Bags

64 gabion bags (The number of bags deposited should be the minimum required to provide the necessary protection, and any surplus bags must be returned to land).

4 Location of pipeline and stabilisation or protection materials

Within an area bounded by the coordinates as listed in application

5 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.

6 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.

7 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.

8 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, using the appropriate Environmental Emissions Monitoring System (EEMS) reporting forms.

9 Deposit returns

The holder of the screening direction shall submit a report to the Department following completion of the deposit covered by the screening direction, confirming the quantity of materials deposited and the estimated area of impact, using the appropriate Environmental Emissions Monitoring System (EEMS) reporting form. Where no deposits are made, a 'nil' return is required.

10 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).

11 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]
Fax



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 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 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 changes to the Project

PL/1103/1 - The post direction amendment is to include activities at Central drill centre which includes the Subsea Control Module (SCM) change out at well CP22, installation of 2 electrical flying leads (PLU6686 and PLU6687) and related stabilisation material.

Summary of the Project

- i) The Installation of a production/gaslift bundle jumper consisting of three lines

at Northwest drill centre FP05 well location (PX204) daisy chaining to FP06 including stabilisation material and relocation of two existing Electrical flying leads (EFL's) and one fly to place lead (FTP)

- ii) 2 EFLs to be installed between CDA C121 and FP05 including stabilisation material
- iii) 1 FTP to be installed between CDA C121 and FP05 including stabilisation material
- iv) Contingency installation of a longer (155m) production/gaslift bundle jumper consisting of three lines at Northwest drill centre FP05 location daisy chaining to FP06 including stabilisation material should the first jumper fail testing.
- v) Change out of West Drill Centre WP27 Subsea Control Module
- vi) Installation of protective material at Central drill centre including relocation of existing lines to install mattresses following a dropped object review.
- vii) SCM change out at CP22 well
- viii) Installation of two EFL's at Central drill Centre including stabilisation material
- ix) Associated temporary deposits for installation methods.

Description of the Project

The project involves the installation of new lines at FP05 (PX204) well in Schiehallion

Northwest drill centre will consist of 95 m of 6"x6"x2" production/gaslift jumper bundle will connect the new FP05 well to the Glen Lyon production system by daisy chaining to 204/20a-F04 (FP06) well (PL6432, PL6427 and PL6428). Two new electrical flying leads (EFL's) of 120 m each (PL6430 and PL6431) and a Fly to Place (FTP) control jumper of 120 m (PLU6429). Stabilisation material will be installed consisting of mattresses and 25kg grout bags. Dredging may be required around connection points along with relocation of existing EFL's (PLU4704 and PLU4705 and FTP (PLU2255) to allow tie in operations. Due to the length of time that the new production jumper has been wet stored for and delays in tie in operations, the project also includes the contingency of installation of a 150 m production jumper bundle should the 95 m jumper fail connection testing.

The operations at West drill centre involve the change out of a failed Subsea control module (SCM) with a like for like module. This will involve the temporary disconnection of the EFL and hydraulic flying lead jumper (HFL), recovery of the existing SCM and installation of the new SCM, followed by re-connection of EFL and HFL and re-instatement of dropped object protection structure.

The operations at Central drill centre involve the installation of mattresses, gabion bags and grout bags in order to provides drops protection to jumpers PL1759, PL1760 and PL3294. These works will also require slight relocations of existing FTP's with FTPs PLU4625 and PLU4626 requiring relocation and contingency additional stabilisation material. In addition the Subsea control module (SCM) at well CP22 will be replaced and the installation of two new EFL's each 155m in length



(PLU6686 and PLU6687) and associated stabilisation material. The operations will mostly be conducted by the Normand Subsea with a total of 40.5 days with the Seven Oceanic vessel undertaking 5 days of operations.

The temporary disturbance of the seabed from all activities associated with these works is 0.00618km² with a permanent deposit of 0.00267km². The cumulative total disturbance of the project with other operations including drilling and sub-sea pipeline tie in activities for the Schiehallion, Loyal and Alligin Field phase A, phase A+, and the CANductors is 0.235km².

There is no risk to human health from the works to install the pipelines or depositing the protective materials on the seabed. There is no credible potential for a major accident or disaster to affect this project.

Any wastes associated with the project will be handled appropriately and no significant impacts are anticipated. The project is not at risk from natural disasters given its location in UK offshore waters.

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 and 204/25, approximately 130 kilometres (km) to the west of the Scottish coastline, and 32 km to the east of the UK-Faroes median line, in a depth of approximately 362- 442 metres (m).

The area in the vicinity of Schiehallion infrastructure is characterised under the European Nature Information System (EUNIS) protocol as Atlantic slope mixed sediment which falls under the deep-sea mixed substrata (A6.2) habitat. The superficial sediments in the wider region comprise of coarse sand with variable contributions of shells, gravels, cobbles and small boulders with a mean particle size of 0.9mm. This layer overlies soft brown clay deposits.

The mean significant wave height is expected to be up to 3m. Currents in the area are predominately north-easterly and mean current speeds are normally in the region of 0.1-0.2ms⁻¹ with a maximum of 2ms⁻¹ at the surface; and 0.05-0.1ms⁻¹ with a maximum speed of 0.3ms⁻¹ at the seabed. 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 NCMFA.

The project lies within the Faroe-Shetland Sponge Belt NCMFA. The closest area of known deep sea sponge aggregations as identified in JNCC is >14km from the proposed works. Site specific surveys were carried out in 2013,2017,2021, 2023 and 2024. The closest survey station for the Northwest Field is SNW which is 400 m northwest from the FP05 (PX204) tie in site where it was found to have very few

sponges. A further survey was conducted in 2023 on the Northwest Drill centre for the PX204 well mooring line routes, for the purposes of a sponge aggregation assessment. The location of the mooring lines touch down points and the assessment area for PX204 from the location of the project (FP05) is approximately 1km distance. The mooring line assessments indicated potential sponge aggregations, however the mooring line surveys are located out with the drill centres and where operations are due to take place. The closest survey station for West drill centre is SW and REF3 at <1km which showed sponge presence however neither met the criteria to be represent the OSPAR definition of deep sea sponge aggregation. A further survey in 2023 for the purposes of sponge aggregation assessment of mooring lines for the West well found sponge densities along 5 mooring chain locations. Based on the high-definition footage survey of the routes at the Schiehallion West drill centre, there is a low to medium confidence in the presence of deep-sea sponge aggregations. However this is located out with the drill centre with the operations to be conducted highly localised to the SCM change out.

The closest survey station for Central drill centre is the SC station located 400 m distance which showed low sponge presence and did not met the criteria to be represent the OSPAR definition of deep sea sponge aggregation. A further survey in 2023 for the purposes of sponge aggregation assessment of mooring lines for the Central PX402 well found sponges along 5 mooring chain locations however the majority were single or low abundance. Based on the high-definition footage survey of the routes at the Central drill centre, there is a low confidence in the presence of deep-sea sponge aggregations.

The Sponge assessment utilising the Henry & Roberts methods showed the whole project area to have low to medium confidence that the feature can be considered a deep-sea sponge aggregation as defined by OSPAR. Another designated feature of the NCMPA is ocean quahog (PMF). No Ocean quahog were observed during site survey work and one adult was identified at Station DC1. No areas qualified for the definition of stony reef, fluid seep areas or other habitats of conservation significance were recorded in the survey area.

Minke whale, long finned pilot whale, white beaked dolphin, harbour porpoise, and Risso's dolphins occur in the area at low densities, with Killer whale and Atlantic white-sided dolphins occurring at low to moderate densities. Harbour and grey seals are unlikely to occur in the area.

Seabird vulnerability in Block 204/20 and 204/25 is low in October and December and very high in November for both blocks with very high in January for 204/25. Similar sensitivities are observed in adjacent blocks. 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 >14 km away. No aggregate dredging and disposal sites, sites of marine archaeological interests, planned offshore renewable energy developments or recreational sailing routes have been 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 project will be carried out using the Normand Subsea and the Seven Oceanic Multipurpose Offshore Vessel within the 500m safety exclusion zone in place for the Northwest, Central and West Drill Centre. Given that the project is located in an area considered to be of low importance to the UK fishing industry, is in an area which has very low shipping density, and the project is of short duration, any impacts on other sea users is not considered to be significant.

The temporary disturbance of the seabed from the project works is 0.00618km² with a permanent deposit of 0.00267km². These seabed impacts will primarily arise from the placement of new jumpers, SCM and associated protection materials as well as the movement of current infrastructure to allow the work to be completed.

The disturbance of the seabed will result in the smothering and mortality of benthic fauna which will result in some short-term temporary impacts. None of the disturbance events are expected to cause significant impact to benthic receptors with a large area of similar seabed in the project area. The most risk is from direct impact resulting from the installation of infrastructure on the seabed with some smothering. It is expected that the benthic communities will regenerate in the area over time. While the surveys indicated areas in the vicinity of the project where deep sea sponges were present, none of the surveys concluded that the areas could be classified as representing the OSPAR definition of deep-sea sponge aggregations.

The cumulative total disturbance of the project with other operations including drilling and sub-sea pipeline tie in activities for the Schiehallion, Loyal and Alligin Field phase A, phase A+ and CANductors, is 0.235km².

The total cumulative disturbance of drilling and tie in operations equates to 0.0025% of the Faroe-Shetland Sponge Belt NCMFA. Given the extent of habitat disturbance at the project location in relation to the size of the NCMFA 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 NCMFA.

Fish, marine mammals and benthic species (which may be PMFs, Annex II species and EPSs) are not considered to be significantly impacted.

Atmospheric emissions from the vessel during the drilling operations are expected to be short lived and likely to be negligible relative to the total emissions associated with shipping. 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 32 km of the operations.

Discharge of offshore chemicals associated with the tie in operations have been assessed as not likely to have a significant effect on the environment. The main risk of accidental release of hydrocarbons is resulting from a loss of diesel inventory from a vessel. The assessment showed that the probability of a diesel spill from a vessel involved in the project is very low, with numerous mitigation measures and procedures in place. It is concluded that an accidental release of a hydrocarbon during the project is not considered to have the potential to cause a major environmental incident (MEI). Therefore, the risk of an oil spill event that could have a significant impact on the environment is minimised.

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.

3. 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 effect on the environment:

Not applicable.