Our Ref: 01.01.01.01-5803U
UKOP Doc Ref:1395090

Offshore Petroleum Regulator for Environment & Decommissioning

BP EXPLORATION OPERATING COMPANY LIMITED
CHERTSEY ROAD
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MIDDLESEX
TW16 7BP

Registered No.: 00305943

Date: 8th May 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
MURLACH [pt of MARNOCK-SKUA], Noble Innovator DRILLING PRODUCER WELL 22/24h- 22/24h-MUR CA planned well

I refer to your amended application dated 6th May 2025, reference DR/2412/8 (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

Signature Not Verified
Digitally signed by Department for Energy Security and Net Zero
Date: 2025.05.08 08:16:55 BST
Reason: On behalf of the Secretary of State
Location: Offshore Petroleum Regulator for Environment and Decommissioning

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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

MURLACH [pt of MARNOCK-SKUA], Noble Innovator DRILLING PRODUCER WELL 22/24h- 22/24h-MUR CA planned well

DR/2412/8 (Version 1)

Whereas BP EXPLORATION OPERATING COMPANY LIMITED has made an application dated 6th May 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/15373/0/IDA/1 and WONS/15373/0/C/1.

Effective Date: 8th May 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 3 October 2023 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:

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]

Offshore Petroleum Regulator
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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 assessments undertaken by OPRED to determine whether an Environmental Impact Assessment is required for this project. This document 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: -

The drilling of a new development producer well (MUR-CA) which will be drilled in the central north sea in Quad/Block 22/24h. Operations are expected to last 275 days and will be drilled at the existing Skua Drilling Centre.

The well will be drilled by a heavy duty jack up (HDJU) rig, the Noble Innovator, which will have a 500m exclusion zone established during drilling and while it is on location.

The HDJU will be held in position using an 8-12 anchor mooring system, and has 3 spud cans which will be in contact with the seabed. The seabed disturbance from the siting of the HDJU has been assessed in a previous drilling screening direction

(DRA/1020) for well MUR-SD, as the HDJU can drill both wells without having to move location.

Drilling of the 42"and 26" sections will be undertaken riserless, using seawater and hi-vis-sweeps with drill cuttings discharged directly at the seabed.

Drilling of 16", 12 " and 8 " sections will be undertaken using Oil Based Mud (OBM), with the drill cuttings treated with Thermo-Mechanical Cuttings Cleaner Unit (TCC) prior to discharge to the marine environment.

Contingency sidetracks have been included to represent the worst assessment case.

Well testing will be undertaken, however the fluids will be retuned to the ETAP platform, where flaring will be undertaken as per the platform's flaring and venting consent. The impact from this flaring has already been assessed and is not assessed as part of this application.

Temporary deposits associated with Tubing Hanger Orientation Spool (THOS) deployment.

The drilling operations are detailed in the application to the NSTA reference WONS/15373/0/IDA/1, WONS/15373/0/C/1 and associated applications.

Summary of the change to the project:

A change to the project was requested under DR/2412/8 (version 1) to amend the operational dates to accommodate a fault finding process as the communication between the subsea testing equipment and the XTs was proving to be intermittent and unreliable. This results in a minor increase in the atmospheric emissions from the vessels carrying out the operations. The text below has been revised accordingly.

Description of the Project

The drilling of the 2 wells (MUR-SD and MUR-CA) at the Murlach development area were considered as part of the Murlach Development (redevelopment of Skua, part of the Marnock-Skua field) Environmental Statement (ES) ES/2022/002. Agreement to the grant of consent for the ES project has been issued by the Department and development and production consent was issued by NSTA on the 8th September 2023.

The project is to drill the well initially riserless for the 42", 36" and 26" sections using seawater and hi-vis sweeps, prior to the conductors being cemented in place and displaced to water based mud (WBM). The lower sections 16", 12.25" and 8.5" will be drilled using Oil Based Mud (OBM). Drill cuttings from the top sections drilled with seawater will be discharged at the seabed. Drill cuttings from the OBM sections will be thermally treated and discharged. Should thermal treatment facilities become unavailable, drill cuttings will be skipped and shipped to shore for disposal. Casings and liner will be cemented in place, the wellbore cleaned, lower completion and

packer run, cleaned to brine and upper completion run and tested in brine. The well will be perforated using coil tubing prior to the well being suspended and debris cap installed.

Operations are expected to last a total of 275 days. The proposed project area is within the Central North sea, and cumulative impacts from drilling discharges, atmospheric emissions and oil and chemical discharges have been assessed. There is the potential for cumulative impacts to occur from the drilling of MUR-SD well, however due to proximity of both wells, it is anticipated that the cuttings from both wells will form a single cutting pile.

It has been concluded that there will be no cumulative impacts expected to occur with this project due to the selection of low bioaccumulation water-based muds, the proposed mitigation and the short duration of the project.

It is not considered to be likely that the project will be affected by natural disasters and 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 drilling project is located in the Murlach Development (part of the Marnock-Skua field in the Central North Sea, in UKCS Block 22/24h, approximately 206 km East of the Scottish coastline, and 39 km west of the UK/Norway Median Line, in a depth of 95m. The seabed in the area of the Murlach Development comprises of sandy mud/muddy sand, shell fragments with occasional pebbles, cobbles and boulders with seabed depressions were present within the Murlach area. These were identified as most likely representing anthropogenic anchor-pull pits and scour features. The annual mean significant wave height ranges from 2.11 to 2.4m. The mean residual current in the area is 0.1m/s.

Benthic surveys identified the fauna in the Murlach area to include sea pens, hermit crabs, brittlestars and starfish. The sediments within the area were described as comprising the broad scale Priority Marine Feature (PMF) habitat 'offshore subtidal sands and gravels' which is the preferred habitat for ocean quahog Arctica islandica. Ocean quahog are a PMF and are also on the OSPAR List of Threatened and/or Declining Species (OSPAR, 2008), however no ocean quahog were recorded within the area.

Seapens were identified at multiple stations across the Murlach area with

assessment suggesting the potential presence of the OSPAR (2008) threatened and/or declining habitat 'Seapens and burrowing megafauna' likely to occur in the vicinity of the proposed operations. A SACFOR assessment classed the burrow density as 'frequent' across all sampling stations. No Annex I habitats were identified during site surveys in the Murlach area, and no other benthic features of conservation importance are thought to occur in the vicinity of the proposed operations. The Murlach development has one protected site within 40 km, with the East of Gannet and Montrose Fields NCMPA located 4 km west of the proposed MUR-CA well.

Seven species of cetaceans have been spotted in the waters around the Murlach Development and these are the Atlantic white-sided dolphin, common dolphin, risso's dolphin, harbour porpoise, killer whale, minke whale, and white beaked dolphin. Grey and harbour seals may be encountered in the area; however, they are not expected to be found in significant densities.

Seabird vulnerability in the vicinity of the Murlach Development is low throughout the year, with no data being available for November.

The proposed operations lie with fishing designated ICES rectangle 43F1 and the project will coincide with fish spawning and/or nursery activity for a number of species. The project area is primarily used for demersal and shellfish fishing and fishing effort in the area is designated as of low intensity, with demersal fishing dominating the species type. Fishing in the area accounted for 0.06% of total fishing effort across the UKCS in 2021. It is not anticipated that the drilling of MUR-CA well will have a significant impact on the fishing industry in the area.

There are 4 wrecks within 10km of the proposed well, with the closest being 4.6km northwest of the site. There are no submarine cables within 40km of the project and there are no military restrictions within the block. The Innovation and Targeted Oil and Gas (INTOG) Area 'E-a' transects Block 22/24h which is an area where projects targeting oil and gas decarbonisation will be considered. The closest renewable energy infrastructure is the Hywind Extent wind site, located approximately 179 km northwest from the proposed project. the closest Sectoral Marine Plan (SMP) is the NE2 Scotwind offer area and is located approximately 78 km to the west of the area. Shipping density in the area is low and there are no shellfish water protected areas within the vicinity.

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 well will be drilled from the Noble Innovator heavy duty jack up rig, (with the environmental impact assessed under DRA/1020). There is an existing 500m safety exclusion zone in place (at the Skua Drill Centre) which excludes unauthorised access of vessels and prohibits access to fishing vessels. An Emergency Response Rescue Vessel (ERRV) will be on site and in addition to providing emergency support to the Noble Innovator, it will act as a guard vessel advising other users of the presence of the mooring anchors and lines which will extend beyond the 500 m exclusion zone. All appropriate notifications to mariners will be made prior to the well drilling activities commencing. Fishing activities within the area are low, and shipping density is considered to be low. No additional impacts to other marine users are identified as part of the drilling of MUR-CA well. Therefore, there are no significant effects likely in terms of physical presence from the proposed project.

Seabed disturbance will arise due to the presence of the HDJU, and the discharge of WBM and drill cuttings and temporary deposits associated with THOS activities. Cuttings dispersion from operations in the central North Sea at similar depths show that cuttings piles are deposited close to the well site, and due to the weak tidal currents in the area, cuttings concentration are expected to be restricted to 100m of the well site.

There is evidence of seapens in the vicinity of the Murlach development, with assessment suggesting the potential presence of the OSPAR (2008) threatened and/or declining habitat 'Seapens and burrowing megafauna'. Seabed disturbance from the discharge of WBM drill cuttings could result in the smothering and mortality of benthic fauna which will result in some short-term temporary impacts. Burrowed mud habitats show a medium sensitivity to smothering, however studies have shown that smothering of some species of seapen has little effect. There is the potential for mortality of individual seapen, and the potential to effect the community of sea pens and burrowing megafauna. However, given the very small area of impact and the discharge of the WBM to the water column, the widespread distribution, short life spans and high reproductive rates of the sensitive species in the area, it is not expected to affect the population levels across the North sea and it is expected that the benthic communities will regenerate in the area over time. Drill cuttings modelling has been conducted and concluded that the discharge of the drill cuttings is not expected to result in a significant adverse impact to the marine environment.

There are no expected transboundary effects from the proposal to drill MUR-CA well. Although the UK/Norwegian median boundary is located approximately 39 km from the proposed well location, it is expected that due to the relatively short duration of the activities, there should be no transboundary effects. It is not considered likely that any planned operational discharge (cuttings and chemicals) will be detectable at a distance of 39km.

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. Noise generated from the project activities will not be significant, and it is concluded that the project is not expected to have a likely significant effect on the site in relation to the cetaceans in the area and the supporting habitats and prey.

The proposed operation will utilise an emergency rescue and response vessel (ERRV), supply vessels, and a HDJU. Atmospheric emissions have been assessed from the diesel used for each vessel and the time spent on location. The total atmospheric emissions (as CO2(e)), from the vessels undertaking the project work is approx. 23,587 tonnes and accounts for 0.119% of the total UKCS CO2(e) emissions (using 2021 as a baseline). The emissions may result in a short-term deterioration of the local air quality, but due to the relatively short duration of the work, and that the exposed conditions in the area will rapidly disperse the emissions, it is not anticipated that there will be a significant impact.

The well to be drilled is a production well, and an assessment has been included within the project proposal to assess as a worst case, an uncontrolled well blow out, 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 MUR-CA well is minimal, and the developer has suitable mitigation in place to prevent such an occurrence.

The drilling operations are in accordance with the National Marine Plan for Scotland's objectives and policies. It is considered that the drilling of the MUR-CA well is not likely to have a significant impact on other offshore activities or other users of the sea and no cumulative impacts are expected to occur.

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