Our Ref: 01.01.01.01-6609U
UKOP Doc Ref:1395572

Offshore Petroleum Regulator for Environment & Decommissioning

REPSOL RESOURCES UK LIMITED
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LONDON
UNITED KINGDOM
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Registered No.: 00825828

Date: 12th 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
PIPER, Piper B Platform, DRILLING PRODUCER WELL 15/17-F

A screening direction for the project detailed in your application, reference DR/2552/0 (Version 3), dated 2nd May 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

Signature Not Verified
Digitally signed by Department for Energy Security and Net Zero
Date: 2025.05.12 11:46:17 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

PIPER, Piper B Platform, DRILLING PRODUCER WELL 15/17-F

DR/2552/0 (Version 3)

Whereas REPSOL RESOURCES UK LIMITED has made an application dated 2nd 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/16680/0/GS/1 (Version 2).

Effective Date: 12th May 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 15 May 2025 until 31 October 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
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AB10 1BJ

Tel [redacted]

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SCHEDULE OF SCREENING DIRECTION 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

The Piper Target F well is planned as a sidetrack from the existing Piper B well 15/17-B19, formerly 15/17-B17
The Piper platform rig will be used to perform drilling and completion operations
The project is expected to take 97 days with 49 days of drilling, commencing May 2025
Following slot recovery, the well will be drilled two sections (12 " and 8 ") with sections using water based mud (WBM), which will be discharged to sea
A maximum of 191.62 m3 of drill cuttings is expected to be discharged overboard via the cuttings chute/caisson.
It is planned to complete the well with a 7 production liner that will be run and cemented in the 8 section.
There is no well test planned

Description of project

This project covers the drilling of the Piper 15/17-F (Target F) well which is a sidetrack to the existing Piper B well 15/17-B19. The well will be drilled and completed from the Piper platform and already has a 500 m safety zone enforced. The 15/17-B19 well is currently suspended with a suspension cap and downhole safety valve. After removing the suspension cap the existing 10" x 9" production

casing will be scraped. It is believed the existing 10 " x 9 " production is not suitable for re-use, therefore it will be cut and pulled. This slot recovery operation is planned to be implemented with seawater and discharged to sea, however a xanthan biopolymer system may be utilised, which is added to the WBM to act as viscosifiers and fluid loss agents, if there are concerns with hydrostatic imbalance (identifiable by the logging operation).

After abandonment/slot recovery the well will be drilled in two sections: 12 " and 8 " both using WBM. An estimated 459,887 kg or 191.62 m3 of cuttings will be discharged to sea.

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 Piper field is located in Block 15/17 of the central North Sea and is located approximately 155 km from Scotland and 72 km from the UK/ Norwegian median line. The water depth at the Piper field is approximately 146 m. The annual mean significant wave height in the vicinity of the Piper field ranges between 2.31 and 2.32 m, with a mean spring tidal range of 1.32 - 1.37 m. Wind speed within Block 15/17 ranges from 8.0 to 8.5 m/s 100 m above sea level in summer, to 12.5 to 13.0 m/s in winter. The seabed habitat at Piper is predicted to be deep circalittoral mud/offshore circalittoral mud.

There has not been any recent full seabed surveys undertaken in the area of the Piper field. The platform has been in place since 1992 and is a built up region of the Central North Sea. Nearby survey data and information from the UK Offshore Energy Strategic Environmental Assessment has been used to estimate the seabed environment in the vicinity of the Piper platform. The benthic environment in the vicinity is silty mud/sand and fine sand. The seabed epifauna was characterised by sea pens (e.g. *Pennatula phosphorea* and *Virgularia mirabilis*) and anemones (e.g. *Urticina felina* and *Bolocera tuediae*) with crustaceans such as *Nephrops norvegicus* and hermit crabs (*Pagurus sp.*) dominating the megafauna. SACFOR analysis was not carried out as part of the survey and this represents a gap in the information available. Seapens were not in the top ten species identified across the survey area and a small number of *P. phosphorea* and *Virgularia mirabilis* samples logged against the sampling stations in the vicinity of the Piper platform.

According to available data, there are no known specified Annex I habitats, such as

'reefs' (bedrock, biogenic and stony) or 'sandbanks which are slightly covered by seawater all the time' in the area of the Piper field. However, areas of gas seepage and associated pockmark features in the North Sea, may fall in line with the Annex I definition of 'submarine structures made by leaking gases'. "Submarine structures made by leaking gases" have been recorded within nearby surveys. Twenty-two pockmarks in this area contained areas of high reflectivity within the depression and were investigated further. None of these displayed any signs of active gas seeps such as bacterial mats or bubbles and no aggregations of methane derived authigenic carbonate (MDAC) were observed. Based on available information, none of the specified Annex I habitats are known to occur in Block 15/17.

The nearest protected area to the proposed well location is the Central Fladen NCMPA, located 42 km northwest of the Piper platform. The NCMPA includes a particular type of mud habitat that is characterised by feather-like soft corals called sea pens, and the burrows made by crustaceans such as mud shrimp and the Norway lobster (*Nephrops norvegicus*). Burrowed mud is an interesting and important marine habitat that supports a rich community of animals. Due to the distance of the operations to the NCMPA it is not likely a significant effect would occur.

Spawning grounds for cod, Norway pout, and Norway lobster coincide with ICES rectangle 45F0 and Block 15/17. Block 15/17 and ICES rectangle 45F0 also coincide with nursery grounds for a number of species such as anglerfish, blue whiting, cod and European hake, where juvenile fish may congregate with older individuals. Norway lobster are the only species for which the spawning period overlaps the proposed operations. Norway lobster are benthic spawning species and are therefore more at risk from activities that disturb the seabed. The distribution of Norway lobster is limited by the extent of suitable muddy sediment in which the animals construct their burrows. There are no periods of concern for the block. Due to the localised seabed disturbance, significant effects are considered unlikely.

In the vicinity of Block 15/17 minke whale, killer whale, common dolphin, white-beaked dolphin, Atlantic white-sided dolphin, Risso's dolphins and harbour porpoise are sighted. Of these species only minke whale, killer whale, white-beaked dolphin, Atlantic white-sided dolphin and harbour porpoise have been sighted specifically within Quadrant 15. Operations covered by this permit will coincide with low to high levels of seabird sensitivity for the Block 15/17. 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, ca. 1.1% of UK overall fishing effort, as is commercial shipping, demersal landings and value for the ICES rectangle 45FO were 2,198 tonnes (ca. 0.4% of UK landings) and £3,981,133 (ca. 0.5% of UK total value) respectively of UK landings for 2023. The Piper field is located in a heavily developed region for oil and gas, with the CoP Saltire platform 6.8 km away. The nearest renewable energy site is the MarramWind Limited site located 48 km from the Piper Platform. There are no telecommunications cables in the vicinity. There are no historic wreaks in the vicinity, although there are 13 wrecks or obstructions within 10

km of the Piper platform and no military restrictions within 40 km. 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.

The Piper Target F well is to be drilled from the Piper platform which already has a 500 m exclusion zone in place. Appropriate notifications will be made and maritime notices posted prior to the commencement of the operations. 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 due to the discharge of 459,887 kg of WBM drill cuttings is expected to have significant thicknesses (over 6.5 mm) and are expected to occur approximately 130 m from the well based on site specific drill cuttings modelling. 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. As operations are to be carried out from the Piper platform, it is not expected that atmospheric emissions would significantly exceed those arising from normal operating procedures at the platform. However, there will be a contribution to atmospheric emissions from increased vessel and helicopter traffic at the platform over the course of the campaign. The proposed operations described in this application will generate an estimated 1,833.93 tonnes of CO2e. The OEUK has

estimated industry GHG emissions in 2023 at 12.9 Mt CO2e (NSTA, 2024) and the proposed operations equate to ca.0.014% of this quantity. Total shipping emissions in 2023 were 11 MtCO2e (Committee on Climate Change, 2024) and the emissions from all proposed operations equate to ca. 0.017% of this total. Given the low contribution to overall emissions, the impact of atmospheric emissions on localised air quality is expected to be negligible.

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, a well blow out within the Piper Bravo 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 15/17-F is minimal, and the developer has suitable mitigation in place to prevent such an occurrence.

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.

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.