

Our Ref: 01.01.01.01-6771U
UKOP Doc Ref:1413363



Offshore Petroleum Regulator
for Environment
& Decommissioning

BP EXPLORATION OPERATING COMPANY LIMITED
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Registered No.: 00305943

Date: 12th September 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**

MUNGO, Noble Innovator DRILLING INJECTOR WELL 22/20-A4

A screening direction for the project detailed in your application, reference DR/2577/0 (Version 3), dated 11th September 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**

MUNGO, Noble Innovator DRILLING INJECTOR WELL 22/20-A4

DR/2577/0 (Version 3)

Whereas BP EXPLORATION OPERATING COMPANY LIMITED has made an application dated 11th September 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/17729/0/GS/1.

Effective Date: 12th September 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 12 September 2025 until 16 March 2026.

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:

N/A

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

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:

- The information provided by the developer;
- The matters listed in Schedule 5 of The Offshore Oil and Gas Exploration, Production, Unloading and Storage (Environmental Impact Regulations 2020) (the Regulations);
- The results of any preliminary verifications or assessments of the effects on the environment of the project; and
- 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 the Project

The drilling of the Mungo sidetrack well referred to as P7PI from the Noble Innovator jack up rig. Prior to sidetracking operations, the main wellbore of the 22/20-A04 will be abandoned as permitted under WIA/1810.

- a two section sidetrack will be drilled; an 8.5" x 10 1/4" section followed by a 6" section both using oil based mud
- the application includes contingency for a mechanical sidetrack
- Cuttings will be treated skipped and shipped

- the well sections will be cemented
- Well will be cleaned up displacing the contents to brine, tested, commissioned and handed back to production for tie in.
- Once the upper completion is tested and commissioned and handed back to production, the well be perforated as stand-alone perforation without the rig.

The drilling operations are detailed in the application to the NSTA reference WONS/17729/0/GS/1.

Description of the Project

The sidetracking of the Mungo A04 well has not been the subject of a previous application under the EIA regulations, though the abandonment of the existing wellbore was subject to well intervention applications under WIA/1810.

The project is to drill the sidetrack to the existing 22/20 A04 well in two sections using OBM by the Noble Innovator mobile jack up rig.

Cuttings containing OBM will be skipped and shipped to shore.

Liners will be cemented in place, the wellbore cleaned up to brine, tested, commissioned and handed over to production for tie in. The well will then be handed back to the wells team for wireline works including perforation.

No cumulative impacts are expected to occur with any other existing or approved projects.

There is not likely to be any significant impact of the project on population and human health. It is not considered 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 drilling project is located at the in the Mungo field which is produced via the Mungo NUI to the ETAP Marnock installation in the Central North Sea in



Block 22/20 approximately 226km East of the Scottish mainland and 14km West of the UK / Norway Boundary line. The water depth is 88m. The annual mean significant wave height ranges from 2.11 to 2.4m. The mean residual currents in the area are 0.1m/s.

The seabed in the area of the Mungo Installation Development comprises of fine poorly sorted sand with low spatial variability. The Mungo field survey area sediment type was identified by Fugro (2019) as one main biotope complex; 'circalittoral muddy sand'. The dominant epifauna taxa present included the sea pens. There is the potential for the presence of the OSPAR threatened and/or declining habitat 'sea pens and burrowing megafauna'. There was some evidence of the presence of Ocean Quahog.

No Annex I habitats were identified during site surveys in the Mungo area. No other benthic features of conservation importance are thought to occur in the vicinity of the proposed operations. The Mungo Installation has one protected site within 40 km with East of Gannet and Montrose Fields NCMPA located 28 km East. The project is within the Scottish National Marine Plan (NMP) area.

Seven species of cetaceans have been spotted in the waters around the Murlach Development: Atlantic white-sided dolphin, bottlenose 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, 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 will coincide with fish spawning and/ or nursery activity for the following species: anglerfish, blue whiting, cod, European hake, haddock, herring, lemon sole, ling, mackerel, Norway lobster, Norway pout, plaice, sandeel, spurdog and whiting. The project area is primarily used for pelagic fishing and the fishing effort in the area is below average.

There are several oil and gas fields nearby. The nearest submarine cable is 9km from the project. There are no nearby Ministry of Defence practice areas. The Innovation and Targeted Oil and Gas (INTOG) E-a area is an area where projects targeting oil and gas decarbonisation have been considered and licencing lease awards announced. This area surrounds the proposed operations. The nearest Offshore Wind INTOG application area is located 15 km south of Block 22/20 and was applied for by TotalEnergies E&P UK.

There are no Crown Estate Scotland Marine Renewable Lease Sites within 40 km of the operations.

Shipping density in the area is low.

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 jack up rig, skidded over the Mungo Platform which has a 500m safety exclusion zone in place excluding unauthorised access of vessels and prohibiting access to fishing vessels. An 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 installation. All appropriate notifications to mariners will be made prior to the well drilling activities commencing. Given that the Mungo Installation is located in an area considered to be of low importance to the UK fishing industry, is in an area which has low shipping density any impacts on other sea users is not considered to be significant.

The project will result in a minor amount of seabed disturbance around an existing oil and gas installation. These seabed impacts will primarily arise the discharge of cement residues and the location of the 3 spud cans for the Noble Innovator.

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' likely to occur. However, Seapens are not expected to be significantly impacted at a population level by the proposed operations. No Annex I habitats have been recorded within the area. Therefore, there are not likely to be any significant effects.

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.

Fish, marine mammals and other benthic species (which may be PMFs, Annex II species and EPSs) are not considered to be significantly impacted. This includes noise impacts to marine mammals, as drilling and vessel noise is deemed below levels which present a significant risk.

The emissions associated with these drilling operations may result in short-term deterioration of local air quality within the vicinity of the well location, however, in the exposed conditions that prevail offshore, these emissions are expected to disperse rapidly such that emissions from the vessels are not considered to have a significant



impact. CO₂e emissions from the operation of the rig and support vessels is estimated to be 6619 tonnes which represents 0.033% of the emissions associated with UK offshore activities annually.

There are no expected transboundary effects from the planned drilling operations. The nearest boundary (UK/Norway Median Line) is located approximately 14 km west of the operations.

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

The drilling operations are in accordance with the National Marine Plan for Scotland's objectives and policies. It is considered that the drilling of the P7PI 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