

Our Ref: 01.01.01.01-6574U
UKOP Doc Ref:1414987



Offshore Petroleum Regulator
for Environment
& Decommissioning

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

Registered No.: 00305943

Date: 24th September 2025

Department for Energy Security &
Net Zero

AB1 Building
Crimon Place
Aberdeen
AB10 1BJ

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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 PIPELINE TIE-IN - PL6444**

I refer to your amended application dated 18th September 2025, reference PL/2546/9 (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

[REDACTED]



**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 PIPELINE TIE-IN - PL6444

PL/2546/9 (Version 1)

Whereas BP EXPLORATION OPERATING COMPANY LIMITED has made an application dated 18th 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, PA/4966, PA/5306, PA/5311 and PA/5730.

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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 25 March 2025 until 31 December 2025.

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

Rock deposits

50,030 tonnes of clean, inert rock material, containing minimal fines, (The quantity of rock deposited should be the minimum required to provide the necessary stabilisation or protection, and any surplus rock must be returned to land).

Sand bags deposits

15 tonnes of clean sand material containing minimal fines contained within 25 kilogramme capacity biodegradable 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).

Grout bags deposits

117 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

460 concrete mattresses, each measuring 6 metres x 3 metres. (The number of mattresses deposited should be the minimum required to provide the necessary protection, and any surplus mattresses must be returned to land).

4 Location of pipeline and stabilisation or protection materials

Within an area bounded by the coordinates 57 degrees 14 minutes 04.89 seconds North - 01 degrees 37 minutes 35.16 East to 57 degrees 17 minutes 40.02 North - 01 degrees 39 minutes 41.28 seconds East

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 Monitoring

The results of any pre or post-placement surveys carried out to confirm the necessity for the deposits covered by the screening direction and/or to confirm the accurate positioning of the stabilisation or protection materials, should be forwarded to the Department following completion of the surveys

8 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.

9 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.

10 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.

11 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).

12 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:

None

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

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

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

Murlach pipeline tie in comprising:

Installation of gas lift flowline PL6444 including deposits of grout bags, concrete mattresses and 50,030 tonnes of rock

Manifold installation with associated grout bags and concrete mattresses

Installation of the following spools with associated grout bag and concrete mattress deposits - PL6527, PL6528, PL6529, PL6530, PL6532, PL6533, PL6535, PL6536, PL6538, PL6539

Installation of the following umbilicals with associated grout bag, concrete mattress and rock deposits - PLU6531, PLU6534, PLU6537

Dynamic Commissioning Operations including - Replacement of UMB18433, UMB18534, UMB18435A, UMB18435B, UMB18536A, UMB18536B -

Contingency subsea control module or Xmas tree change out, choke valve or manifold or Xmas tree valve replacements - Contingency replacement of Hydraulic flying lead (HFL) and Electrical Flying lead (EFL) from manifolds and associated grout bags.

Barrier testing

Summary of the change to the project

PL/2546/9

A change to the project was requested under PL/2546/9 to include additional temporary deposits from the Seven Atlantic's campaign. The impacts of these changes have been assessed and are minor. The below text remains valid.

PL/2546/8

A change to the project was requested under PL/2546/8 (version 1) to preform an additional Gas Lift Line Leak Test at the Seagull manifold in support of dynamic positioning. The work will add up to an additional 5 days and will include the temporary deposit of 1 subsea basket (potentially up to 3 placements). The impacts of these changes have been assessed and are minor. The text below remains valid.

PL/2546/7

A change to the project was requested to cover Dynamic Commissioning Operations which included potential contingency manifold, Xmas tree, subsea control modules or valve replacements. In addition contingency new EFL and HFL lines with associated stabilisation material.

PL/2546/6

A change to the project was requested under PL/2546/6 (version 1) for temporary seabed disturbance and temporary deposits to the seabed. The impacts of these changes have been assessed and are minor. The text below remains valid.

PL/2546/5

A change to the project was requested under PL/2546/5 (version 1) adding further additional temporary deposits to the seabed. The impacts of these changes have been assessed and are minor. The text below remains valid.

PL/2546/4

A change to the project was requested under PL/2546/4 (version 1) adding additional temporary deposits to the seabed. The impacts of these changes have been assessed and are minor. The text below remains valid.

PL/2546/3

A change to the project was requested under PL/2546/3 (version 1) adding additional pipeline surveys resulting in extra days of vessel operations. The impacts of these changes have been assessed and are minor. The text below remains valid.



PL/2546/2

A change to the project was requested under PL/2546/2 (version 1) adding localised dredging operations to allow installation of spools. The impacts of these changes have been assessed and are minor. The text below remains valid.

PL/2546/1

A change to the project was requested under PL/2546/1 (version 1) amending the vessels to be used for the operation and the time in service, which had a corresponding increase in the atmospheric emissions. A visual and multibeam survey of the pipeline area was also added. Minor amendments were made to the temporary deposits. The impacts of these changes have been assessed and are negligible. The text below remains valid.

Description of the project

The project has been the subject of a previous application i.e. the Murlach Environmental Statement reference ES/2022/002 and Screening Directions related to the drilling of the Murlach SD (DR/2411) and Murlach CA (DR/2412) wells.

The project entails the installation of a 7.44km gas lift flowline between the Murlach manifold and the ETAP installation, installation of the manifold and installation of associated tie in spools and umbilicals. In addition the Dynamic commissioning operations include the potential replacement of UMB18433, UMB18534, UMB18435A, UMB18435B, UMB18536A, UMB18536B. Contingency subsea control module or Xmas tree change out, choke valve or manifold or Xmas tree valve replacements. Contingency replacement of Hydraulic flying lead (HFL) and Electrical Flying lead (EFL) from manifolds or Xmas trees. The operations require a number of stabilisation materials including rock, mattresses, grout bags and sandbags to be deposited.

The potential for cumulative impacts has been considered specifically discharges to sea of chemicals, atmospheric emissions from the vessels and their presence in a navigational sense and seabed impacts. It is concluded that there are unlikely to be any significant cumulative impacts.

It is not considered to be likely that the project will be affected by natural disasters. The risk of a major accident been assessed and is considered very unlikely. 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 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 95 metres (m). The main flowline will run from Murlach wells to the ETAP installation approximately 7km to the North.

Seabed surveys have been carried out at either end of the gas lift line i.e. at the Murlach drill centre and the ETAP platform and data implies that the benthos in the area of the flow line installation is uniform.

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 present in the area. These were identified as most likely representing anthropogenic anchor-pull pits and scour features.

Water depth on the pipeline route ranges from 95 to 97.8 meters. The annual mean significant wave height ranges from 2.11 to 2.4m. The mean residual currents in the area are 0.1m/s.

Benthic surveys identified the Fauna in the Murlach area included; sea pens, hermit crabs, brittlestars, starfish (Asteroidea: including *Asterias rubens* and *Astropecten irregularis*), anemones, colonial anemones, soft coral, squat lobsters, sea spiders, *Nephrops norvegicus*, crabs (*Brachyura* including *Majidae* and *Liocarcinus depurator*), hydroids and Hydrozoa/Bryozoan turf. This was broadly consistent with the findings of the ETAP surveys.

The sediments within the area were described as comprising the broad scale Priority Marine Feature (PMF) habitat 'offshore subtidal sands and gravels' a habitat which is widely distributed and unlikely to be of conservation significance.

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' being likely to occur in the vicinity of the proposed operations.

Limited evidence was found of Ocean Quahog during surveys.

No Annex I habitats were identified during site surveys in the Murlach area. 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 East of Gannet and Montrose Fields NCMFA located 4 km west of the proposed MUR-SD well. 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, common dolphin, risso's dolphin, harbour porpoise, killer whale, minke whale, and whitebeaked 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. Fishing effort in the area is rated as very low.

There are several oil and gas fields nearby. There are no submarine cables within 15km of the project. There are no nearby Ministry of Defence restricted areas in the relevant blocks. The Murlach field is located within the offshore wind innovation and targeted oil and gas (INTOG) area E-a and 8 km northwest of an INTOG Application area for floating wind (NMPI, 2024). The Cenozoic development has been applied for by Flotation Energy and V rgr nn. The Culzean consented application, applied for by TotalEnergies E&P UK, is also located approximately 8 km northwest of the proposed operations.

Shipping density in the area of the pipeline installation is low.

There are six wrecks within 10 km radius of the Murlach pipeline route. These are all classified as non-dangerous wrecks. There is no known wreck of historical importance (Historic Marine Protected Area (MPA)) near the proposed operations (NMPI, 2024).

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.

Seabed disturbance will result in the direct loss of habitat. This however, is small in extent. Although seabed impacts will cause mortality of individuals, impacts to benthic species at a population level are not expected given the relatively localised nature of the operations in comparison to the surrounding seabed. For Seapens localised loss of habitats through seabed deposits will not affect the seapen

populations and impacts at population level are not expected. Similarly, taking into account the localised area of operations, and that only minor evidence of ocean quahog were observed during the surveys it is concluded this will not affect ocean quahog at a population level.

The nearest protected area, East of Gannet and Montrose Nature Conservation Marine Protected Area, at 4 km distant is very unlikely to suffer seabed impacts from these operations.

Risk assessment concluded that chemical discharges associated with the operations are not considered to present a significant impact to the marine environment. It is expected that the chemicals discharged during the planned operations are likely to be diluted quickly and rapidly dispersed.

Atmospheric emissions from the vessels conducting the operations have been assessed. Any emissions are expected to rapidly dispersed and temporary in nature and hardly detectable a short distance away from the operations. Combustion of fuel results in a minor emission of CO₂ when viewed in the context of total UK offshore emissions.

Operations will take place both in and outwith established 500m zones. Collision risk is considered to be low as is the potential to disrupt fishing effort. Operations are therefore not considered to have a significant effect on other sea users.

The potential for cumulative impacts of marine discharges, atmospheric emissions, seabed impacts and navigation has been considered and is deemed minor.

The operations are 35km from the UK / Norway boundary line and thus transboundary effects are considered unlikely.

A large spill of hydrocarbons is very unlikely during the proposed operations as the works will be conducted across the Murlach pipeline, manifold and infrastructure which will have barriers in place.

The operations are in accordance with the National Marine Plan for Scotland's 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.

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:

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N/A