Our Ref: 01.01.01.01-6680U
UKOP Doc Ref:1417076

Offshore Petroleum Regulator for Environment & Decommissioning

DANA PETROLEUM (E&P) LIMITED
78 CANNON STREET
LONDON
EC4N 6AF

Registered No.: 02294746

Date: 8th October 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
Bittern WI pipeline replacement

I refer to your amended application dated 6th October 2025, reference PL/2565/3 (Version 2).

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 Dan Stewart on 01224 254037 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: 2025.10.08 14:48:50 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

Bittern WI pipeline replacement

PL/2565/3 (Version 2)

Whereas DANA PETROLEUM (E&P) LIMITED has made an application dated 6th October 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/5373 and PA/5374.

Effective Date: 8th October 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 25 June 2025 until 30 May 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

Rock deposits

101,380 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).

Grout bags deposits

60.65 tonnes of grout 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).

Concrete mattress deposits

209 concrete mattresses in total. 80 measuring 6 metres x 3 metres x 0.3 metres and 129 measuring 6 metres x 3 metres x 0.15 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:

at the locations detailed in the PL SAT

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:

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
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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 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 changes to the project

PLA/1133, PL/2565/1 (Version 1) - updating end date

PLA/1133, PL/2565/2 (Version 1) - Concrete mattress thickness changed from 0.15m to 0.3m for 80 mattresses. No change to impact area assessed.

PLA/1133, PL/2565/3 (Version 2) - updated to include temporary wet storage of six spools.

Summary of the project

Installation of:

A replacement water injection (WI) 12" pipeline (PL6609)

7.6" flexible pipeline (PL6609)

A new valve skid at the Bittern field (BIVS)

Tie-in spools

The pipeline will be jet trenched and buried using trench backfill material

Areas at the approaches will be protected using rock placement (101,380 tonnes including contingency), 25 kg biodegradable grout bags (a total of 2,426 grout bags) and concrete protection mattresses (a total of 209 mattresses)

Description of the project

The project entails the installation of a new WI pipeline (PL6609) from a new BIVS structure to the Bittern field WI wells WA and WB. The existing WI pipeline (PL1994) will be left in-situ until decommissioning, with the exception of two spool segments. The new pipeline will cross existing pipelines and umbilicals. A combination of mattresses, biodegradable grout bags and rock placement will be used as protection at the crossings.

A new BIVS structure will be installed within the Triton FPSO 500 m exclusion zone in order to connect the FPSO to the new WI pipeline (PL6609). The new 12" WI pipeline (PL6609) will be 24.42 km long and will be installed and tied into the new BIVS structure. It will be jet trenched and buried using trench backfill material. Areas which are not trenched at the Bittern and Triton approaches will be protected from fishing gear interaction and/or dropped objects by a combination of rock placement, biodegradable grout bags and concrete protection mattresses. The new WI pipeline (PL6609) will connect the BIVS to the WA and WB trees in order to reinstate water injection at the Bittern field. In addition, the existing Clapham WI pipeline (PL1994) will be disconnected and tied into the new BIVS structure to re-instate water injection to the DC5 manifold which forms part of the Clapham field.

No significant cumulative interactions are foreseen with any other existing or approved projects. There is not likely to be any significant impact of the project on population and human health. There is no credible potential for a major accident or disaster to affect this project. No significant impacts are anticipated.

Location of 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 Triton FPSO is located in United Kingdom Continental Shelf (UKCS) Blocks 21/30 and the Bittern field is located in UKCS Block 29/1. At the operations closest points, the Triton FPSO is located approximately 166 km east of the Scottish coastline and the Bittern manifolds are located 84 km west of the UK/Norway boundary line. The new WI pipeline (PL6609) will be 24.42 km long and will be located across UKCS Blocks 21/24, 21/30, 28/5 and 29/1 within the CNS. In addition, works will also be conducted to reroute water injection to the Clapham field through tying in the existing WI pipeline (PL1994) from the DC5 manifold to the new BIVS.

The proposed pipeline installation operations are located in a water depth ranging from 91 -101 m, the Clapham DC5 manifold is in 84 m water depth. The annual mean significant wave height ranges from 1.51 to 2.4 m. The mean residual currents in the area are 0.1 m/s.

The sampled sediments within the Bittern survey area were largely homogenous and dominated by the sand fraction, with all sediments classed as 'muddy sand' according to the Folk classification. In addition, there were also a number of boulders identified along the pipeline route. The sediments in the vicinity of the Triton FPSO and Clapham fields were classified as predominately fine sands.

From the 2023 Fugro survey, the macrofaunal community was relatively homogenous across the Bittern area, with the annelid *P. jeffreysii* recorded as the most abundant and dominant taxa across all stations. This was typically followed by the annelids *Galathowenia oculata, Eclysippe vanelli, Ampharete falcata* and the mollusc *Axinulus croulinensis* . The observed macrofauna was considered typical of muddy sand sediments within the CNS. The following Priority Marine Feature (PMF) seabed features are known to occur within the wider CNS area: 'burrowed mud', 'seapens and burrowing megafauna in circalittoral fine mud', 'deep sea sponge aggregations', 'Northern sea fan and sponge communities', 'offshore deep-sea muds', 'offshore subtidal sands and gravels' and ocean quahog (Arctica islandica). No live shells or paired siphons characteristic of *A. islandica* were visible at the sediment surface on any transects in either the 2018 or 2023 survey. During the 2023 there were Abundant and Superabundant SACFOR abundance of small ocean quahog individuals, which are not considered part of the permanent community.

No other Annex I habitats, Annex II species, OSPAR threatened and/or declining species and habitats, Scottish PMF habitats or species, or International Union for Conservation of Nature Red List of threatened species were observed within the area of proposed operations.

The closest offshore protected area to the proposed operations is the East of Gannet and Montrose NCMPA, located approximately 6 km to the northeast.

The proposed operations are within an area of high nursery intensity of cod (*Gadus morhua*), and high concentration spawning for mackerel (*Scomber scombrus*) and Norway pout (*Trisopterus esmarkii*). Of the species recorded to spawn in the area, sandeels and Norway lobster (*Nephrops norvegicus*) are benthic spawning species. There is a period of concern in Blocks 29/1 and 28/5 for seismic surveys from May to August.

Seabird sensitivity in Blocks, 21/30, 21/24, 28/5 and 29/1 is recorded as low throughout the year. Harbour porpoise, minke whale, Atlantic white-sided dolphin and white-beaked dolphin have been recorded in the vicinity of the proposed operations. Since the proposed operations are located approximately 166 km offshore, grey and harbour seals may be encountered from time to time but it is not likely that they use the area with any regularity or in great numbers.

ICES rectangle 42F0 is targeted primarily for shellfish species, which in 2023 accounted for approximately 79% of value and 47% of live weight landed. Similarly, ICES rectangle 42F1 is also targeted primarily for shellfish species, which in 2023 accounted for approximately 83% of value and almost 54% of live weight landed. Alternatively, the primary target in ICES rectangle 43F0 is demersal species, which in 2023 accounted for 45% and 43% of the value and live weight landed, respectively. ICES rectangles 42F0, 42F1 and 43F0 catches were below average for both landings and value when compared to the overall UKCS.

There are a number of installations located within the vicinity of the proposed operations; Gannet A platform is 13 km northeast, Anasuria FPSO is 20 km northwest and Catcher FPSO is 25 km southwest.

The proposed operations are located in areas of very low to low vessel traffic. There are no military practice or exercise areas in the vicinity of the proposed operations. The nearest submarine cable to the proposed area of operations is the under construction North Sea Link Interconnector and this is located 16 km, at the closest point, from the proposed operations. The closest known non-dangerous wreck to the proposed operations is 4.2 km to the northeast. There are no historical Marine Protected Areas (MPA), fouls, protected military remains or scheduled monuments in the vicinity.

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 licensing lease awards announced. This area surrounds the proposed operations. The nearest operational offshore wind area is the Hywind Scotland offshore located approximately 168 km to the northwest of the proposed operations. The closest approved INTOG project areas are located approximately 9 km southwest and 21 km northeast. The closest Crown Estate Scotland Marine Renewable Lease Sites is the Bellrock Agreement/Option for Lease located 41 km southwest of the proposed operations. This site is in the pre-planning stage.

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, 0.0497 km2 temporary impact and 0.2938 km2 permanent impact. 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 distance 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 out with established 500 m zones. Collison 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 potential for cumulative impacts of marine discharges, atmospheric emissions, seabed impacts and navigation has been considered and is deemed minor.

The operations are roughly 84 km from the UK / Norway boundary line and thus transboundary effects are considered unlikely.

The release of diesel fuel from the project vessel is considered a low risk due to the controls in place. If diesel is released to the marine environment, it is a non-persistent hydrocarbon and will rapidly disperse and evaporate. In the event of a diesel release the vessels would respond in accordance with their shipboard oil pollution emergency plan (SOPEP). There is no major environmental incident potential associated with the project.

The pipe lay 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: N/A