Our Ref: 01.01.01.01-7074U
UKOP Doc Ref:1440498

Offshore Petroleum Regulator for Environment & Decommissioning

ADURA OPERATIONS LIMITED
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Registered No.: 16172712

Date: 23rd March 2026

Department for Energy Security & Net Zero

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Tel [redacted]
Fax

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opred@energysecurity.gov.uk

Dear Sir / Madam

THE OFFSHORE OIL AND GAS EXPLORATION, PRODUCTION, UNLOADING AND STORAGE (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2020
ROSEBANK, Deepsea Atlantic DRILLING WELL 213/27a-DDP31 development well

A screening direction for the project detailed in your application, reference DR/2633/0 (Version 5), dated 17th March 2026 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.

Approval of permit DR/2633/0 (Version 5) does not affect the Department's consideration of any further information provided for ES/2022/001. The commercial decision to undertake further project work in the absence of a new decision on ES/2022/001 is at the developer's own risk including as to whether or not the grant of consent will be agreed to for ES/2022/001. No extraction of oil or gas is permitted by the grant of this permit.

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: 2026.03.23 10:01:32 GMT
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

ROSEBANK, Deepsea Atlantic DRILLING WELL 213/27a-DDP31 development well

DR/2633/0 (Version 5)

Whereas ADURA OPERATIONS LIMITED has made an application dated 17th March 2026, 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/18361/0/IDA/1 Version 2 and WONS/18523/0/C/1 Version 1

Effective Date: 23rd March 2026

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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 23 March 2026 until 31 December 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:

DR/2633/0 (Version 5)

Approval of permit DR/2633/0 (Version 5) does not affect the Department's consideration of any further information provided for ES/2022/001. The commercial decision to undertake further project work in the absence of a new decision on ES/2022/001 is at the developer's own risk including as to whether or not the grant of consent will be agreed to for ES/2022/001. No extraction of oil or gas is permitted by the grant of this permit.

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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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 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 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

DR/2633/0
The screening direction covers the drilling of the 213/27a-DDP31 (DP3) well. The screening direction covers the drilling of the 213/27a-DDP1 well. No extraction i.e., production, of oil or gas is permitted by this screening direction and this direction does not affect consideration of the environmental impact assessment number ES/2022/001.

This application covers the following steps:

- Drilling of 36" section riserless with seawater sweeps and displaced to Water based mud (WBM) utilising a cuttings transfer system (RCTS)

- Drilling of the 26" section riserless with seawater sweeps and WBM utilising a RCTS

- Drilling of the 17.5" section with WBM;

- Drilling of the 12.25" section with WBM

- Drilling of the 8.5" section using low toxicity oil based mud (LTOBM) cuttings to be skipped and shipped to shore

- Contingency for re-drill of 17.5, 12.25 and 8.5" sections.

- Run and install Lower and Upper Completions;

- Suspend the well.

- Installation of Xmas tree in a separate campaign

- There is no well test planned during the operations

Description of the project

The project involves the drilling of well DP3 from the mobile drilling unit (MODU) Deep Sea Atlantic while operating on dynamic positioning. The well will be drilled as part of a batch drilling campaign of 4 wells (two in drilling template D and two wells in drilling template C). The conductor sections will be drilled moving onto the next well conductor section, prior to returning to drill the lower sections of each well. The drilling of each well is assessed under separate screening directions. The drilling templates were installed under PLA/1172. This project includes the drilling of the top-hole of well DP3 at drilling template D; riserless section (36" and 26" diameter) of the well with a combination of seawater / sweeps; Water Based Mud (WBM). Mud and cuttings from these sections will be transported approximately 50 metres from the drilling template via a ROV Cuttings Transfer System (RCTS). The RCTS is an ejector system which uses a water pump and hose to transport cuttings away from the template.

The 17.5" and 12.25" sections will be drilled with WBM with the riser in place returning the mud and cuttings to the MODU for treatment via the shale shakers prior to discharge overboard. The 8.5" section will be drilled with LTOBM with mud and cuttings being skipped for onshore disposal.

The drilling operation is estimated to take 90 days between March and December 2026.

The potential for cumulative impacts to occur from any other existing or approved projects is considered to be low.

It is not considered to be likely that the project will be affected by natural disasters.

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 will occur in the Rosebank Field from the Deep Sea Atlantic MODU and is located in UKCS licence block 213/27a. It is located in the Faroe-Shetland Channel 130km to the north-west of the Shetland Islands approximately 15km from the UK-Faroes transboundary line. The water depth at the proposed project location is approximately 1110 m.

The project site experiences stronger winds and rougher sea conditions than other regions of the UKCS. Winds above 8m/s occur 70% of winter and 30% of summer. Water currents are stratified due to depths exceeding 1,000m, with mean residual currents near Rosebank at 0.2-0.4m/s. Seabed temperatures recorded in May are about 1.5 C, varying seasonally. The area is affected by long fetch and strong, predominantly SW-NE or W-E waves, with significant wave heights reaching a mean of 4.1m (max 15.1m) in January and 1.7m (max 6.3m) in July.

The European standard classification system (EUNIS) describes the seabed at the Rosebank field as comprising predominantly of; A5.27 Deep circalittoral sand in the east; A5.15 Deep circalittoral coarse sediment; A6.2 Deep-sea mixed strata; and A6.5 Deep-sea mud. Surveys have confirmed seabed sediments to be relatively homogenous comprising very soft, sandy clay and the presence of boulders or glacial drop stones. The survey evidence found habitats of subtidal sands and gravels as well as offshore deep sea muds which are a Scottish Priority Marine Feature (PMF).

Total Organic Carbon (TOC) at the in-field area ranged from 3.2 to 4.4 mg/kg with Total hydrocarbon (THC) in sediments ranging from 1.3 g/g to 34.6 g/g. THC measured noticeably higher (27.2 g/g) reflecting possible weathered hydrocarbon inputs. Concentration of metals were generally low.

The benthos within the Rosebank field has a muddy seabed. Mobile species such as large sea spiders and occasional scavenging amphipods, together with sedentary burrowing or attached forms such as the soft corals Primnoa and Dendronephthya, colonial hydroids, burrowing anemones, encrusting sponges, and the carnivorous club sponge Chondrocladia gigantea were also found to be characteristic of the area.

Ocean Quahog are designated as Scottish PMFs. No specimens were identified in the sampled material from across the survey stations. There are no known cold-water coral reefs in the vicinity of the Rosebank Development area. Coral gardens and deep-sea sponge aggregations were not recorded in the in-field survey reports. No other Priority Marine Features or OSPAR habitat types were recorded in the infield survey reports.

The project location lies within the International Council for the Exploration of the Sea (ICES) rectangle 50E6 and is spawning and nursery grounds for Blue Whiting, Ling,

Mackerel and Norway Pout. All of which are considered PMFs.

Commercial fisheries data is available for 50E6, for fishing effort is generally low with the landings and values data also being considered low.

Eight seabird species have been identified regularly in the area west of Shetland in the area throughout the year; these are the northern fulmar, northern gannet, black-legged kittiwake, Atlantic puffin, great black-backed gull, common guillemot, herring gull and razorbill. Mainly during summer, the European storm petrel, lesser black-backed gull (often seen in moderate to high densities along the shelf edge before breeding), Leach's storm petrel, Manx shearwater, Arctic tern (typically nearshore), Arctic skua, and great skua are observed. The Seabird Oil Sensitivity Index (SOSI) is identified as either very high or extremely high in the UKCS licensing blocks surrounding the project during September and October; for Block 213/27, the project location, the SOSI index is either low or medium throughout the year.

The most frequently sighted cetaceans for the project location are Atlantic white-sided dolphin, harbour porpoise, killer whale, long-finned pilot whale, minke whale, Risso's dolphin and white-beaked dolphin. SCANS IV block CS-K survey information indicates that harbour porpoise and white-beaked dolphin are the most abundant. All species that have been sighted in the vicinity of the Rosebank area are listed as European Protected Species (EPS) under the Habitats Directive and as Scottish PMFs. In addition to this, harbour porpoise is also listed as an Annex II species under the Habitats Directive.

Of the seven pinniped species in the North East Atlantic, only grey, harbour and hooded seals are likely to occur near the Rosebank field, and their numbers are low.

The closest protected site to the Rosebank field the Faroe Shetland Sponge Belt Nature Conservation Marine Protected Area (FSSB NCMPA) 24 km North west. The FSSB MPA is designated for aggregations of the OSPAR threatened and/or declining habitat of deep-sea sponges. It is also designated for offshore subtidal sands and gravels, presence of ocean quahog, large scale continental slope features, and features representative of the West Shetland Margin Paleo-depositional system Key Geodiversity area, including continental slope channels, iceberg plough marks, prograding wedges, slide deposits, sand wave fields, and sediment wave fields.

Other offshore conservation sites have been identified greater that 100km away.

Shipping activities in northwest Shetland are low compared with the North Sea and English Channel. Shipping activity around the Rosebank area is negligible to low.

There are several other oil and gas activities within the vicinity of the field, however, the closest being Edradour and the West of Shetland Pipeline System within 35km. Clair and Clair Ridge platforms are 80km away.

There are no military exercise areas of danger in the vicinity of the development.

The SHEFA-2 Cable lies 13.5km from template D.

There are no wrecks designated under the Protection of Military Remains Act 1986. The wreck of the Bourbon Dolphin lies to 6km west of template D.

The project location is within the Sectoral Marine Plan Offshore Wind Innovation and Targeted Oil and Gas (INTOG) area INTOG WoSa. However, there are no INTOG application areas near the project location.

There are no shellfish water protected areas or active shellfish sites located within 40 km of the proposed operations. The closest active aquaculture sites are located along the Shetland coast, approximately 130 km from the proposed operations. There are no other economic marine activities e.g. aggregate extraction located in the marine environment West of Shetland.

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.

Seawater and sweeps will be used to drill the 36" and 26" sections of the well, with the cuttings discharged to the seabed approximately 50m away from the template using the RCTS system. The cementing of the 30" conductor and 20" casing in these sections will result in cement returns onto the seabed. The cement will also be transferred via the RCTS system and will be discharged away from the template. This will result in smaller deposits. Drill cuttings modelling was undertaken for a 4 well scenario at each location and indicates a maximum thickness of overlapping cuttings piles of 7.438m, extending out to an area of 0.18km2 with a layer of 1mm. The RCTS system will result in several smaller piles less than 2m thick and therefore the impacts are expected to be less than the modelled results. Smothering by drill cuttings and small volumes of cement will locally change median grain size and affect local benthic communities. The drill cuttings modelling demonstrated that although direct mortality may occur if individuals are present at the direct drill site, the amount of sedimentation rapidly declines with distance therefore it is not anticipated that the project will cause a significant impact to benthic species at a population level. Due to the small area impacted, the PMF's identified, offshore deep-sea muds and subtidal sands and gravels, are unlikely to significantly effected in terms of the characteristics and extent of the habitats. Benthic species such as Gersemia associated with the presence of the OSPAR threatened and/or declining habitats coral gardens have

been identified as rare or occasional and therefore not considered at a density to fulfil the criteria for coral garden classification. No other protected habitats and species have been identified within the potential impact zones of the drilling discharges.

WBM and cuttings from the 17.5" and 12.25" sections will be returned to the MODU for treatment via shale shakers. Prior to discharge, samples are collected and analysed for their crude oil content according to the requirements contained in the Oil Discharge Permit for the well operation. The impacts of the discharge of entrained WBM and cuttings is not considered to be significant given the low toxicity of the product. The chemical additives in the WBM are generally water-soluble and are expected to dissolve, dissociate and disperse during settlement through the water column. The impacts of the discharge at the seabed and sea surface are likely to be short lived with no significant residual impact. The direction of the wider-scale deposition of particulates discharged at sea surface is dominated by prevailing currents and these fall through the water column and eventually settle on the seabed.

The LTOBM mud and cuttings from the 8.5" sections will be skipped and shipped to shore for treatment and disposal and therefore there will be no impacts related to a discharge from these drilling operations.

Slops and residual liquid drilling waste will be treated in the soil-tech unit prior to discharge to sea. The impact of the discharge is not considered significant.

There will be temporary seabed disturbance caused by the placement of the seabed transponders required for the dynamic position of the MODU; this will result in a temporary disturbance area of 4m2 at each template location. The temporary disturbance is not considered to be significant. No other seabed disturbance is expected from the positioning of the MODU.

All chemicals associated with this project are registered as offshore chemicals under the Offshore Chemicals Notification Scheme. The use and discharge of these offshore chemicals have been assessed, and a risk assessment and a justification was provided where necessary. The use and discharge of the offshore chemicals associated with this project are considered not to be significant to the marine environment.

Impacts on fish species are not expected given the localised nature of the operation and the low sensitivity of the area. Similarly, given that spawning grounds occur over large regions of the North Sea, fish species are unlikely to be significantly impacted by discharges from the operations. There are no benthic spawners such as sandeels and shellfish that are likely to spawn in the vicinity of ICES rectangles 51E6 and 50E6.
The atmospheric emissions associated with the drilling operations has been assessed over 90 days to include emissions from the MODU and from the supply vessels, emergency rescue and recovery vessel (ERRV) and helicopters. The Greenhouse gas (GHG) emissions have been assessed and represent a very small proportion of emissions associated with UKCS offshore oil and gas activities. Measures have been put in place to minimise vessel trips and optimise drilling

operations. The project will also result in non-GHG atmospheric emissions which are likely to result in localised air quality impacts but are expected to disperse rapidly. Consequently, the impacts arising from these emissions on climate change and local air quality are not expected to be significant.

No impulsive noise sources are being used and disturbance from vessel noise is unlikely to be significant. Therefore, no significant impacts on marine mammals as a result of noise from the proposed operations are expected.

The cumulative impacts resulting from these were not considered to be significant owing to the localised nature of the operations.

The closest protected site is the FSSB NCMPA located approximately 24 km to the south-east. It is unlikely that the planned operations will have a significant effect on the designated features of the protected area. Environmental and habitat assessment surveys have not identified any Annex I Habitats within the development area.

The risk of a major accident such as a well blowout has been assessed. The Operator 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. The Major Environmental Incident (MEI) assessment indicates that a worst case (uncontrolled and unmitigated) well blowout scenario from Rosebank field wells has the potential to cause significant damage, as defined by the Environmental Liability Directive, to protected species or habitats (listed under the Annex I of the Birds Directive and/or Annex I, II and IV species listed under the Habitats Directive) and coastal economies and could constitute an MEI as defined in the Offshore Safety Directive. The spill prevention and mitigation measures detailed in the application and in supporting documentation including the OPEP makes such an event extremely unlikely.

The MODU has been assessed as suitable to operate in the weather conditions expected at Rosebank with the operational window and operational steps scheduled to account for this.

In the case of an accidental diesel release from the MODU, diesel is lighter than water and tends to evaporate and readily disperse into the water column. A spill could still result in impacts on fish, seabirds and marine mammals. However, the risk is minimised by implementation of operating procedures such that the impacts are not likely to be significant.

The risk to other users of the sea from the presence of the MODU is considered not to be significant as the shipping and fishing activity is considered low. A 500m safety zone will be established around the MODU and an Emergency Rescue and Recovery Vessel (ERRV) will operate and follow the established vessel approach and collision avoidance procedures.

The transboundary impacts as a result of the proposed operations has been assessed and is not considered significant.

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 well is not likely to have a significant impact on other offshore activities or other users of the sea.

2. 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.

3. 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 effect on the environment:

Not applicable