

Our Ref: 01.01.01.01-7069U
UKOP Doc Ref:1439111



Offshore Petroleum Regulator
for Environment
& Decommissioning

ADURA OPERATIONS LIMITED
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Date: 11th March 2026

Department for Energy Security &
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Aberdeen
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Dear Sir / Madam

**THE OFFSHORE OIL AND GAS EXPLORATION, PRODUCTION, UNLOADING
AND STORAGE (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS
2020
PIPELINE PL2858**

A screening direction for the project detailed in your application, reference PL/2631/0 (Version 2), dated 27th February 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.

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**

PIPELINE PL2858

PL/2631/0 (Version 2)

Whereas ADURA OPERATIONS LIMITED has made an application dated 27th February 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, PA/5912.

Effective Date: 11th March 2026

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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 15 March 2026 until 14 March 2027.

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

Grout bags deposits

4000 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

96 [Number] concrete mattresses, each measuring 6 metres x 3 metres x 0.15 centimetres. (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

As detailed within the application.

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:

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

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 the project

The Pierce Gas Injector to Producer project (GI2P) project involves reconfiguration of the Pierce A1, A2Y and A4 wells. The Pierce A2Y and A4 wells will be converted from injector wells to producing wells. The project will involve the following activities:

- Removal of 6 bits of infrastructure that is to be recovered to shore.
- Movement of 2 bits of infrastructure.
- Disconnection of infrastructure that will be recovered to shore.
- The placement of stabilisation and protection materials to support the new subsea infrastructure

- Minor dredging activities at A4 and A2Y spool routes.

Details of the works have been described within the associated application to the North Sea Transition Authority (NSTA) for a pipeline works authorisation (PWA), reference PA/5912.

Description of the project

The Pierce Gas Injector to Producer project (GI2P) project involves reconfiguration of the Pierce A1, A2Y and A4 wells. The Pierce A2Y and A4 wells will be converted from injector wells to producing wells. The following operations are to take place:

PL2858: The 6" drop down spool connected to well A2Y is to be disconnected and recovered to shore.

PL4183: The 6" Drop down spool connected PL4183 to well A2Y is to be disconnected and recovered to shore. A new 6"/2.5" reducing spool will be connected PL4183 to PL2858 to provide gas lift from MDSM to PGDM.

PL4004: 6" rigid drop down tie-in spool will be removed and recovered to shore. A new replacement that ties into spool (PL6760) will be installed. Tie-in to well A1 will be reconfigured with a new 6" rigid tee tie-in spool at A1 XT arrangement, PL6760, from well A1 to PL4004 via existing tee-piece to allow connection to MDSM and A12 well. The new tie-in spool PL6760 also connects to new pipeline PL6759 to allow tie-in to well A2Y.

PL6760: 6" NB rigid production pipeline installed from Pierce well A1 to PL4004 and branching to PL6759.

PL6759: 6" NB rigid production pipeline installed from Pierce well A1 (via PL6760 connection) to Pierce A2Y.

PL4184: Disconnected at both ends and taken out of use. The pup piece spool connecting to manifold and the drop down connecting to the A4 well will be returned to shore. 6" flexible jumper will be recovered at the end of field life.

PL4863: Branch of PL4863 to PL6758.

PL6758: New 6" NB rigid production pipeline PL6758 installed from Pierce well A4 and tied into PL4863.

The works will be undertaken from a dive support vessel (DSV), using dynamic positioning, meaning it won't require the use of anchors to maintain its position.

Seabed Deposits

Stabilisation and protection materials, namely concrete mattresses and grout bags will be deposited on the lines and recovered as part of the decommissioning process



at the end of field life, however for the purposes of this assessment the impact on the seabed is considered permanent. The following permanent deposits will be made:

Grout bags: Installation of 160 x 25 kg grout bags i.e., 4 te

- Temporary area of impact (m2): 100
- Permanent area of impact (m2): 100

Mattresses: Laydown of 96 mattresses 6 m (L) x 3 m (W)

- Temporary area of impact (m2): 2112
- Permanent area of impact (m2): 3840

Dredging may be required at A4 and A2y spool route to level the seabed. It is estimated that divers are required to dredge up to 1.4m³ at A4 and 1m³ at A2y of sediment.

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 Pierce Field is located in Blocks 23/22a and 23/27a in the Central North Sea (CNS) in the United Kingdom Continental Shelf (UKCS), approximately 245 km east of Aberdeen and 1 km west of the UK/Norway median line and falls within the area of the Scottish National Marine Plan.

The site is not within any site designated for nature conservation or marine protection. The closest protected site is the East of Gannet and Montrose Field NCMPA which is c. 42 km west of the Pierce Field. This site is designated for offshore deep-sea muds and *A. islandica* aggregations. The Fulmar MCZ is located south of Pierce in the English marine plan area and protects a range of habitat features.

Cetacean species likely to occur within the area include Atlantic white-sided dolphin, which reach high densities in September and with a smaller peak occurring in July but densities remain low in this secondary peak. White-beaked dolphin occur between May and November reaching high densities in September to November, with another peak in May. Minke whale only occur in low densities during February to April. Harbour porpoise have a peak in October where densities are observed and moderate densities in June and July. Risso's dolphin occur in low density in July.

The distribution and abundance of seabird species varies seasonally and annually. Species such as Atlantic puffin (*Fratercula arctica*), black-legged kittiwake (*Rissa tridactyla*) and northern fulmar (*Fulmarus glacialis*) use the area in the breeding

season (March - September), whereas other species such as the common guillemot (*Uria aalge*) are present in higher densities in the winter season (November - March). Seabird sensitivity to surface oil pollution within the Pierce area during the requested permit period (August to December) is predicted to be low, with the exceptions of Block 23/6, where it is classed as high in September and October.

The Pierce Field lies within the International Council for the Exploration of the Sea (ICES) Rectangle 43F2 and fish spawning and nursery grounds are known to occur in 43F2. Spawning grounds for cod, lemon sole, mackerel, Norway pout, plaice and sandeel have been identified during the period of operation. In addition, higher egg concentrations were also noted for mackerel and Norway pout. The area is noted as a high intensity nursery ground for cod.

The benthos at Pierce is characterised by circalittoral muddy sand which displays evidence of burrows of varying densities with some areas showing dense numbers of burrows. Epifauna within the Pierce MDS and SDS survey areas is known to be relatively sparse, with varying densities of sea anemones (*Bolocera tuediae*), sea pens (*Virgularia mirabilis* and *Pennatula phosphorea*), seastars (Asteroidea), sea urchins (*Gracilechinus actus*), hermit crabs (Paguroidea) and bivalve molluscs (Mytilidae) observed. Epifaunal abundance was higher at those stations containing higher proportions of coarse material. Benthic fauna is dominated by infaunal polychaetes namely *Paramphinome jeffreysii* with the Norway Lobster *Nephrops norvegicus* also being present forming large burrows. The habitat shows a resemblance to the OSPAR listed threatened and/or declining habitat 'Sea pens and burrowing megafauna communities', yet the area does lack the surface mounds which are normally associated with this habitat.

Data on fishing effort indicates that the Pierce field is in an area which is of low importance. The field sits within ICES rectangle 43F2 and fisheries data published by Marine Scotland for the years 2020 - 2024 show that fishing effort in ICES rectangle 43F2 is extremely low.

According to Oil and Gas Authority data, shipping density within Block 23/27 is low and within Block 23/22 it is very low. There are also no aggregate extraction areas, military exercise areas or existing or proposed renewable energy developments within the vicinity of Block 23/22. Pierce is within a well-developed oil and gas production area with a number of pipelines and umbilicals present.

The Pierce area is situated within Innovation and Targeted Oil and Gas (INTOG) Area E-a. The Culzean wind turbine is the closest active windfarm located approximately 22 km to the west. The closest foul ground is located approximately 3 km north-west of MDS. No dangerous wrecks are located in the vicinity of Pierce.

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.

All works will take place within the 500 metre safety zone of Pierce Drill and satellite manifold meaning the likelihood of the works interacting with other sea users is low. The DSV will be dynamically positioned and not fixed to the seabed and the operator will take measures to inform other sea users of the works, in addition there were no navigational concerns raised by consultees. The risk of collision and impacts to sea users will therefore be minimal.

Benthic and seabed impacts will occur due to the interaction with the seabed from stabilisation material (grout bags and concrete mattresses) on the pipeline. The worst case temporary impact, which includes the wider area of seabed disturbance around the deposited materials, will be up to 2,112 m². The area of permanent impact, which comprises the seabed area covered by stabilization materials, is up to 3840 m². The physical disturbance resulting from the installation activities can cause mortality or displacement of motile benthic species in the impacted area and direct mortality of sessile seabed organisms that cannot move away from the contact area. In addition, disturbance from sediment re-suspension will occur in the immediate area when the infrastructure is initially positioned. There will be a loss of functional habitat below the stabilisation materials i.e. mattresses as this area will not be available to many of the organisms which normally utilise this type of sediment habitat. The scale of these impacts is very small, furthermore the area affected by temporary impacts will likely show a full recovery of its benthic faunal assemblage.

Atmospheric emissions will be limited to combustion gases emitted by the dive support vessel. The main combustion products associated with power generation on the vessel is carbon dioxide (CO₂) with small quantities of methane (CH₄), volatile organic compounds (VOCs), oxides of nitrogen (NO_x), carbon monoxide (CO) and very small quantities of nitrous oxide (N₂O) and sulphur dioxide (SO₂). Whilst all greenhouse emissions do influence climate the quantity of gases produced during these operations will be negligible and represent a very small relative contribution to the UKCS total emissions.

Chemicals will be used and discharged to the marine environment and these discharges will be controlled by an associated chemical permit. Some of these chemicals will be toxic and could have an effect on the local marine environment, however the quantities discharged are small and the high flushing and dilution rates of the receiving environment will prevent toxic concentrations forming which could have a significant impact on the local environment.

Although not a planned activity, an accidental and unplanned release of diesel from a vessel and worst case well blow out from well A14 has been assessed. The

developer has mitigation and control measures in place to prevent such a release from occurring but if it does occur they also have response plans and resources in place to reduce and limit any impacts. The proposed operations carried out as planned are not likely to have a significant effect on the environment and the probability of an unplanned release from the proposed operations is low.

There is no aggregate dredging, military practice sites, sites of marine archaeological interests, aquaculture sites or energy developments within the vicinity of the proposed operations which could be negatively impacted. The operations are in accordance with the Scottish Marine Plan's objectives and policies.

It is considered that the installation of subsea infrastructure for the Pierce GI2P project is not likely to have a significant impact on other offshore activities, users of the sea or the natural environment. This conclusion is based on an assessment where the impacts from the activity have been considered alone, in combination and cumulatively with any other activities.

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: