

Our Ref: 01.01.01.01-7125U
UKOP Doc Ref:1446272



Offshore Petroleum Regulator
for Environment
& Decommissioning

ADURA OPERATIONS LIMITED
C/O BRODIES LLP
90 BARTHOLOMEW CLOSE
LONDON
UNITED KINGDOM
EC1A 7BN

Registered No.: 16172712

Date: 15th May 2026

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
MARINER, Mariner PDQ Platform, DRILLING INJECTOR WELL 9/11a-A21
(AEIG-P)**

A screening direction for the project detailed in your application, reference DR/2646/0 (Version 4), dated 14th May 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**

**MARINER, Mariner PDQ Platform, DRILLING INJECTOR WELL 9/11a-A21
(AEIG-P)**

DR/2646/0 (Version 4)

Whereas ADURA OPERATIONS LIMITED has made an application dated 14th May 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/12668/0/IDA/1 Version 1 and WONS/18406/0/C/1 Version 1.

Effective Date: 15th May 2026

Our Ref: 01.01.01.01-7125U
UKOP Doc Ref:1446272



Offshore Petroleum Regulator
for Environment
& Decommissioning



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 19 May 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.

Our Ref: 01.01.01.01-7125U
UKOP Doc Ref:1446272



Offshore Petroleum Regulator
for Environment
& Decommissioning



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:

There are no comments at this time

3) All communications relating to the screening direction should be addressed to:

opred@energysecurity.gov.uk

or

Offshore Petroleum Regulator for Environment & Decommissioning
Department for Energy Security & Net Zero
AB1 Building
Crimon Place
Aberdeen
AB10 1BJ

Tel [REDACTED]



SCHEDULE OF SCREENING DIRECTION DECISION REASONS

The Secretary of State has decided that, based on the information provided, the project is not likely to have a significant effect on the environment. The main reasons for this decision are:

1) Decision reasons

The following provides a summary of the 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

DR/2646/0

The application covers the drilling of the well 9/11a-A21 AEIG-P. The top-hole section (34" diameter) was drilled under DR/1638 (DRA/680). The current permit is DR/2646 and covers the following:

- Re-entry to the 34" section
- Drilling of the 24" section with seawater and water based mud (WBM);
- Drilling of the 17.5" section with Low Toxicity Oil Based Mud (LTOBM);
- Drilling of the 12.25" section with LTOBM;
- Drilling of the final 8.5" section with WBM into the reservoir section;
- A contingency 8.5" section with WBM;
- Lower and upper completions
- Wellbore clean up and displaced to brine solution to temporarily suspend the well;
- Installing a Xmas tree
- There is no well test associated with this project.

Description of the project

The project involves the drilling of the lower sections of the well 9/11a-A21 AEIG-P from the Mariner A Production and Drilling Quarters Platform (PDQ). The well follows a number of other platform wells drilled from the Mariner A PDQ following the same approach, where the upper sections of the well are drilled and later returned to complete the full well.

The project to drill the top hole riserless section of well 9/11a-A21 AEIG-P has already been completed under DR/1638 and is discussed here for clarity. That project involved the drilling of the top-hole, riserless section (34" diameter) of the well with Water Based Mud (WBM). A 28" conductor has been cemented in place to provide structural integrity. As this section was riserless and using seawater sweeps, the mud and cuttings were discharged directly on to the seabed.

The drilling of the full well under DR/2646/0 will be completed with the riser in place. The 24" section will be drilled with seawater, changing to water based mud with drill cuttings discharged overboard. Following displacing to LTOBM the drilling of the 17.5" and 12.25" sections with LTOBM will be undertaken. All mud and cuttings from these sections will be discharged to sea following treatment in a thermo-mechanical cuttings cleaner (TCC).

The well will be circulated from LTOBM to WBM to drill the final 8.5" section, during this point all slops will be contained and disposed of by shipping onshore for disposal and therefore no residual LTOBM or chemicals will be discharged. Following this, cuttings from the 8.5" section will be treated in shale shakers to remove any entrained reservoir hydrocarbons prior to discharge to sea. The application includes a contingency 8.5" sidetrack which if required will be drilled with WBM.

The project is expected to take 35 days to complete, however, an end date of 31 December 2026 provides contingency for any operational delays.

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 Mariner Field from the Mariner A PDQ and is located in UKCS licence block 9/11a. It is located 131 km to the southeast of Shetland and 45 km west from the UK/Norway median line. The water depth at the proposed project location is approximately 110 m.

The seabed at the proposed project location comprises mainly sandy sediment (92.5-95.0%) with fines (4.88-7.48%) and limited gravel (0.01-0.16%). The EUNIS



classification of the benthos is deep circalittoral sand. There are no Annex I habitats identified in the proposed project area. Sea pen (*Funiculina quadrangularis*) were identified in a survey, however, the species was not spotted at an abundance sufficient to constitute the OSPAR habitat 'Sea pens and burrowing megafauna communities'. No OSPAR habitats have been identified in the proposed project area. Ocean quahog (*Arctica islandica*), a Priority Marine Features (PMF), has been identified in the proposed project area.

Benthic survey samples were dominated by newly settled juveniles of sea urchins (*Echionidea/Spatangoida*). Other benthic species identified in surveys of the area include polychaete *Spiophanes bombyx*, brittle star *Ophiosten affinis*, horseshoe worm *Phoronis* spp and tube dwelling anemone *Cerianthus lloydii*. Fish species identified in surveys of the area include cod *Gadus morhua*, pollock *Pollachius pollachius*, turbot *Scophthalmus maximus* and hagfish *Myxine glutinosa*.

The following PMF fish species have been identified in the proposed project area: angler fish, blue whiting, cod, European Hake, Haddock, herring, ling, mackerel, Norway Lobster, Norway pout, Saith, Sandeel and Whiting.

The following cetacean species have been identified in the proposed project area: Atlantic white-sided dolphin, Harbour porpoise, Killer whale, Minke whale, White-beaked dolphin.

Seal species have been identified in the proposed project area. Harbour seal and Grey seal have been found to be present in the proposed project area at low densities.

The proposed project is not located within a designated site. The Braemar pockmarks Special Area of Conservation (SAC) is closest, located approximately 69km southeast of Mariner A PDQ. Its designated features are Annex I habitat of 'Submarine structures made by leaking gases' as designated under the EC Habitats Directive. The next closest protected area to the proposed project is the Central Fladen NCMFA, 79 km away. It is designated features are burrowed mud (characterised by sea pens and burrowing megafauna), as well as the presence of sub-glacial tunnel valley representative of the Fladen Deeps Key Geodiversity area.

Seabird oil sensitivity in block 9/11 is low throughout the year, except in May when it is medium. There is no data on seabird oil sensitivity for April, October, November or December.

The proposed project is located in Scottish waters and therefore the Scotland's National Marine Plan applies.

The proposed project area is located in International Council for the Exploration of the Sea (ICES) rectangle 48F1. The fishing effort in the rectangle is considered to be above average compared to overall UKCS fishing effort. The target species in the area were demersal and the most utilised gear type in the area was trawls in 2024.

Shipping density in the proposed project area is considered to be very low.

The following oil and gas installations are within 40 km of the proposed project area: Mariner B, Beryl B, Beryl A, Beryl SPM2/3, Gryphon Alpha, Bruce and Kraken.

The proposed project is not located within military training areas.

The closest cable to the proposed project area is the TAMPNET 4 Bu4 which is connected to the Mariner A PDQ. The other closest cable is the TAMPNET 4 trunk which is located 1.5 km southwest.

The proposed project is within the Innovation and Targeted Oil and Gas (INTOG) NE-c area.

There are no wrecks in the vicinity of the proposed project.

There are no aquaculture sites within 40 km of the proposed project area.

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.

The impacts of drilling the 34" section were assessed under DR/1638 but are discussed here for completeness. The WBM cuttings of the 34" section were discharged to the seabed in the immediate vicinity of the well. However, the impacts of this are not considered to be significant given the low toxicity and small volumes associated with the conductor section.

The cementing operations for the conductor casing assessed under DR/1638 at the formation interface may have resulted in limited amounts of cement discharged at the seabed. The current project will result in no further cement returns to the seabed with all cement returned to the platform and disposed of. There will be small volumes of cement discharged overboard during the cleaning of the cementing equipment. The cement fines will disperse quickly through the water column and are unlikely to cause a significant effect. Impacts on protected species and fish species are not expected given the localised nature of the operation and the low sensitivity of the area.

The operator has applied for an 'aborted cement' operation. This quantity is limited to



a single batch from the onboard pit, 40m³ for cement slurry and 50m³ for the cement spacer fluids. The cement fines will disperse quickly through the water column and are unlikely to cause a significant effect as the chemicals within the spacer are soluble and will disperse. In the last 5 years of drilling operations at Mariner, the operator has had two incidents where a small portion of a cement batch had to be aborted. Impacts on protected species and fish species are not expected given the localised nature of the operation and the low sensitivity of the area.

WBM cuttings from the 24" section will be discharged overboard. The impacts of this are 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 discharge of drill cuttings and spent WBM will cause a temporary increase in suspended sediment levels and turbidity within the water column, which could potentially affect primary production locally through reduction of light levels.

Smothering by drill cuttings will, locally, change median grain size, and affect local benthic communities. Ocean Quahogs were found in the survey area, however drill cuttings modelling showed rapid dispersion with a maximum thickness of 1150mm directly at the drill centre declining to 6.5mm by 750m. Ocean Quahog have high sensitivity to sedimentation events which are greater than 300mm. 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 declined with distance therefore it is not anticipated that the project will cause a significant impact to Ocean Quahog at a local level or population level. According to studies, the drill cuttings generated from the intensive drilling at Mariner fall well below the OSPAR thresholds for these categories.

Dispersion of cuttings is influenced by various factors, including particle size distribution and density, vertical and horizontal turbulence, current flows, and water depth. The direction of currents within the Mariner area is predominantly to the southeast suggesting that the cuttings from the well will be distributed to the south. Due to the localised area of impact associated with the cuttings, habitats and benthic species are not considered to be impacted on a large scale. Similarly, given that spawning grounds occur over large regions of the North Sea, demersal spawning species, including sandeels are not considered to be significantly impacted by cuttings deposition.

The LTOBM cuttings from the 17 1/2 " and the 12 1/4" sections will be treated via the TCC unit to remove oil and water from the cuttings. The planned discharges of drill cuttings may result in some localised impacts to benthic marine organisms close to the drill site location, resulting primarily from oxygen depletion and smothering. However, most of the TCC treated cuttings are expected to disperse through the water column rather than settling on the seabed. Cuttings deposition will reduce with distance from the drill site with the residual oil content degrading further over time and potential impacts are considered unlikely to have a significant effect on sediments and benthic species. Any base oil recovered from the TCC is re-used in OBM fluids. Any residual fluids discharged from the TCC unit are discharged

overboard following treatment in the soil-tech unit and the impact is not considered significant.

Prior to drilling the 8 1/2" section the well will be circulated from LTOBM to WBM and any discharges contained for disposal onshore and therefore there will be no discharges of residual LTOBM or chemicals. WBM drill fluids and cuttings from the 8 1/2 " drilling section, including the sidetrack, may contain some reservoir hydrocarbons as the well is drilled through the reservoir section. The WBM cuttings from this section are passed over the shale shakers in the mud cube units. This process recovers WBM from the mix of WBM drill fluids and cuttings returned from the well. The recovered WBM may contain reservoir hydrocarbons and is transferred to skips for transportation onshore for re-conditioning and subsequent re-use in WBM drill fluids. The cuttings from the reservoir section and remaining WBM drill fluids (mud) entrained on the cuttings are discharged overboard to the marine environment after passing over the shale shakers in the mudcube units. 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.

Drilling operations will be conducted from the existing Mariner A PDQ Installation such that there is no increase in the infrastructure footprint on the seabed.

The impact of use and discharge of chemicals from this project and change to the project are considered not to be significant to the marine environment as detailed in the chemical risk assessment submitted for this operation.

Drilling operations will be undertaken from the Mariner A PDQ and no additional equipment will be required for the drilling activities. Atmospheric emissions associated with the project will result from power demand for the proposed operations. Therefore, significantly increased emissions resulting from drilling operations are not expected. 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. Therefore, no significant impacts on marine mammals as a result of noise from the proposed operations are expected.

Past discharge of WBM and drill cuttings were considered and given the benthic features of the area and the size of discharges. The cumulative impacts resulting from these were not considered to be significant owing to the localised nature of the operations.

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 Mariner PDQ 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.

In the case of an accidental diesel release from the Mariner A PDQ, it is expected to evaporate quickly due to its very high level of light ends. The low asphaltene content prevents emulsification, therefore reducing its persistence in the marine environment. As such, a diesel release is not expected to present a significant risk.

The closest international boundary is 45 km away and therefore the risk of transboundary impacts as a result of the proposed operations 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 9/11a-A21 AEIG-P is not likely to have a significant impact on other offshore activities or other users of the sea.

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