Our Ref: 01.01.01.01-6907U
UKOP Doc Ref:1450990

Offshore Petroleum Regulator
for Environment
& Decommissioning

ADURA OPERATIONS LIMITED
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Registered No.: 16172712

Date: 29th June 2026

Department for Energy Security &
Net Zero

AB1 Building
Crimon Place
Aberdeen
AB10 1BJ

Tel [redacted]
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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
MARINER, Mariner PDQ Platform, DRILLING PRODUCER WELL 9/11a- AUPG planned well

I refer to your amended application dated 26th June 2026, reference DR/2608/1 (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 [redacted] on [redacted] or email the Environmental Management Team at opred@energysecurity.gov.uk.

Yours faithfully

Signature valid

Digitally signed by Department for Energy Security and Net Zero
Date: 2026.06.29 11:08:24 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

MARINER, Mariner PDQ Platform, DRILLING PRODUCER WELL 9/11a- AUPG planned well

DR/2608/1 (Version 2)

Whereas ADURA OPERATIONS LIMITED has made an application dated 26th June 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/18032/1/IDA/1 (Version 1) and WONS/18446/0/C/1.

Effective Date: 29th June 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 2 December 2025 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:

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
AB1 Building
Crimon Place
Aberdeen
AB10 1BJ

[redacted]

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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 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/2608/0

The application DR/2608 covers the drilling of the top-hole riserless section (34" diameter) of the well AUPG. This will be drilled with seawater sweeps; a Water based Mud (WBM). The Section length was 101.7m and a 28" conductor is cemented in place to provide structural integrity.

DR/2608/1

The subsequent application covers the drilling of the well AUPG to target depth which includes 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 a 8.5" section with WBM into the reservoir section;

- A contingency sidetrack 8.5" section with WBM;

- Lower and upper completions;

- Wellbore clean up and displaced to clean packer fluid;

- Well tie in to production;

- There is no well test associated with this project.

Description of the project

The initial project involved the drilling of the top hole riserless section of well 9/11a-AUPG. The drilling of the top-hole, riserless section (34" diameter) of the well was drilled with seawater / spud mud; a Water Based Mud (WBM). A 28" conductor was cemented in place to provide structural integrity. As this section is riserless and using seawater sweeps, the mud and cuttings were discharged directly on to the seabed.

The 34" conductor section was drilled to allow the conductor to be set within a competent formation. Once the section is drilled to Target Depth (TD), the wellbore will be displaced to a high viscosity mud system prior to run the conductor. The conductor string will be cemented to the seabed. The start head was then installed on the top of the conductor.

The well was then suspended after the conductor was run and cemented to allow further time for the cement to cure prior to drilling ahead.

DR/2608/1 covers the completion of the well to target depth with a contingent sidetrack, conductor installation and completions. The 24" section will be drilled to a depth of 712 meters measured depth below rotary table (MDBRT) for the casing to be set within a competent formation. This section will be drilled with viscosified seawater with the cuttings returned back to the rig floor and discharged overboard.

The 17.5" section of the well will be drilled using LTOBM to a depth of 1,894m MDBRT with a 13.375" casing run and cemented. The cuttings from this section will be returned to the rig and treated via a Thermo-Mechanical Cuttings Cleaner (TCC)

prior to discharge.

The final 8.5" section is drilled with WBM to reach the target measured depth of approximately 3,233m into the Heimdal Reservoir. All cuttings will be returned to the rig, treated via shale shakers and discharge overboard. 5.5" screens will be run in the reservoir section. The lower completion includes open hole packers for zonal isolation. An ESP pump will be installed, and the cased hole displaced to clean packer fluids. The well will be tied in and handed over to production.

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. The risk of a major accident such as a well blowout has been assessed. The Developer has control measures in place to reduce the risk of a major accident occurring and the probability of such an event occurring is very low.

Other than the matters considered further below, there is not likely to be any significant impact of the project on population and human health.

Location of the project

Having regard, in particular, to the matters identified at paragraphs 2(a) to (c) of Schedule 5 to the Regulations, the environmental sensitivity of geographical areas likely to be affected by the project has been considered as follows:-

The proposed project is located in block 9/11a. It is located 134 km to the southwest of UK shorelines and 45 km from the UK/Norway median line. The 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*), an OSPAR threatened/declining species and a Priority Marine Features (PMF) were identified in the wider survey area with the closest station being <1km away.

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 *Ophiocten 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 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 NCMPA, 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 low. The target species in the area were demersal and the most utilised gear type in the area was trawls, accounting for 96% of effort 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.

WBM cuttings of AUPG conductor 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 top hole and conductor section. WBM will dissolve and disperse in the water column. Smothering by drill cuttings will, locally, change median grain size, and affect local benthic communities. Similarly the 24" and 8.5" section will be drilled using WBM. All mud and cuttings from the 24" and 8.5" sections will be discharged into the water column from overboard. This will temporarily increase the sediment load and turbidity of the water column which given the currents and annual mean wave power will dissipate quickly and have minimal impact.

Ocean Quahogs were found in the wider 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.

The 17.5" section will be drilled with LTOBM drilling fluids which significantly reduces the technical risks associated with drilling at this depth. The cuttings from this section are treated via the TCC unit which will reduce the concentration of oil on cuttings to below the allowable 1% limit. The recovered water from the TCC unit typically contains a chemical hydrocarbon concentration between 200-1500 mg/l. The recovered solids and water are sampled to ensure that they are within the concentrations stated within the associated Chemical permit.

The TCC slurry has a higher density than the WBM discharges so is considered less likely to disperse readily into the water column. Given the meteorological conditions, the LTOBM cutting slurry is expected to disperse over a wider area in an extremely thin layer.

The WBM drill fluids and cuttings from the 8.5" section may contain some reservoir

hydrocarbons as the well in drilled in the reservoir section. The WBM cuttings from this section are passed over the shale shakers in the mudcube 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. This is the routine management option for WBM fluids from the reservoir section of the well which are recovered in the mudcube units. The discharge of reservoir hydrocarbons on drill muds and cuttings has the potential to impact the receiving marine environment through organic enrichment of the surrounding environment at the well. The operator has demonstrated BPEO given the limited options for treatment. Strict sampling regime will be implemented to ensure that the concentrations do not exceed those detailed within the application.

Therefore, the potential cumulative impacts due to drilling discharges around Mariner is expected to be low.

The cementing operations are limited to the cementing of the conductor casing at the formation interface which may cause a cement patio of approximately 5 m2. 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 impacts of the chemicals that will be used have been considered to not pose a risk 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 and the proposed project is not located in area where marine mammals have been identified as designated features. Therefore, no significant impacts on marine mammals as a result of noise from the proposed operations are expected.

Past discharge of WBM, treated LTOBM and drill cuttings were considered and given the benthic features of the area and the size of discharges. The impacts resulting from these were not considered to be significant.

The main risk associated with the drilling of the proposed Mariner well are from the well blow out hydrocarbon release scenarios at the AUPG well and the mariner worst case blow out. The current worst case oil release scenario as per the well blowout modelling included in the approved Mariner Field OPEP could also constitute an MEI.

The probability of a blow out has been assessed to be extremely low and appropriate mitigation measures are in place to prevent such incidents occurring and to respond appropriately should an incident arise.

In the case of an accidental diesel release from the Mariner A PDQ during diesel bunkering, 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. There is no potential for Mayor Environmental Incident resulting from a Major Accidental Hazard associated with this project.

The closest international boundary is 45 km away and therefore the risk of transboundary impacts as a result of the proposed operations is low.

Drilling operations will be conducted from the existing Mariner A PDQ Installation such that there is no increase in the infrastructure footprint. 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-AUPG Mariner well and completion is not likely to have a significant impact on other offshore activities or other users of the sea and limited cumulative impacts are expected to occur.

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:

Not applicable.