

Our Ref: 01.01.01.01-6908U
UKOP Doc Ref:1454494



Offshore Petroleum Regulator
for Environment
& Decommissioning

ADURA OPERATIONS LIMITED
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Registered No.: 16172712

Date: 27th July 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**

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

A screening direction for the project detailed in your application, reference DR/2609/2 (Version 1), dated 2nd July 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 PRODUCER WELL 9/11a-AEPA
planned well**

DR/2609/2 (Version 1)

Whereas ADURA OPERATIONS LIMITED has made an application dated 2nd July 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/18044/0/IDA/1 (Version 1) and WONS/18044/1/C/1 Version 1.

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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 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

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 changes to the Project

DR/2609/2

This variation is to cover the drilling and completion of the full AEPA well now that the conductor has been successfully installed under DR/2609/0.

Summary of the project

DR/2609/0

The application DR/2609 covers the drilling of the top-hole riserless section (34" diameter) of the well AEPA. This will be drilled with seawater sweeps; a Water based Mud (WBM). The 28" conductor will then be cemented in place to provide structural integrity.

Description of the project

The project comprises the drilling and completion of production well 9/11a-A47 AEPA at the Mariner A Production and Drilling Quarters (PDQ) platform, in the Mariner oil field.

The first part of the project under DR/2609/0 involved drilling of the top hole riserless section of well (34" diameter) with seawater / spud mud; a Water Based Mud (WBM). A 28" conductor was cemented in place to provide structural integrity. As this section was riserless using seawater sweeps, the mud and cuttings were discharged directly on to the seabed.

The 34" conductor section was then drilled to allow the conductor to be set within a competent formation. Once the section was drilled to Target Depth (TD), the wellbore was displaced to a high viscosity mud system prior to the conductor being cemented in place.

The remainder of the well will be drilled as follows:

- Drilling of the 24" section with viscosified seawater

- Drilling of the 17.5" section with Low Toxicity Oil Based Mud (LTOBM);

- Drilling of the 12.25" section with Low Toxicity Oil Based Mud (LTOBM)

- Drilling of the 8.5" section into the reservoir with Water Based Mud (WBM);

- A contingency 8 " sidetrack, if required, will be drilled with WBM;

- The 20" casing will be cemented to surface;

- The 17.5" & 12.25" sections cased with 13 3/8" and 9 5/8" production casing subsequently cemented in place;

- The lower completions include a 5 " Standalone Sand Screens (SAS) and open hole packers for zonal isolation;

- Casing clean up and displaced to brine solution to temporarily suspend the well;

- Running the upper completion, including the electric submersible pump

- There is no well test associated with this project.

The well follows a number of other platform wells drilled from the Mariner A PDQ following a similar approach. The drilling of the full well under the current project will be completed with a riser in place. The 24" section will be drilled with seawater with drill cuttings discharged overboard. The following 17.5" and 12.25" sections will be drilled with LTOBM. 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, following this cuttings from the 8.5" section will be treated in shale shakers to remove 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 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 UKCS Block 9/11a, approximately 131 km southeast of the Shetland Islands and 45 km west of the UK/Norway median line, in approximately 110 m water depth

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 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 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 Deep 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 primarily demersal and pelagic, and the most utilised gear type was trawls, accounting for 96% of fishing effort in 2023. 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, 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 12 wrecks within 20 km of the proposed operations, all of which are classed as non-dangerous. There are no Historical MPAs or scheduled monuments located within Block 9/11. 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/2609/0 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/2609/0 and it was concluded this activity may have resulted in limited amounts of cement discharged at the seabed. The current project to drill the full well will result in no further cement returns to the seabed with all cement returned to the platform and disposed of via the Drilling Equipment set. 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 a 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.

WBM will dissolve and disperse in the water column. Smothering by drill cuttings will, locally, change median grain size, and affect local benthic communities. Ocean Quahog 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. 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, with all drilling equipment powered by the existing platform power generation system. Atmospheric emissions associated with the project will therefore be limited to the additional power demand placed on the existing generation equipment, which is expected to remain within normal operational load requirements. 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 discharges of WBM and drill cuttings have been considered. Given the benthic features of the area, the localised nature of the discharges and the existing drilling history at Mariner, cumulative impacts are not considered likely to be significant.

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.

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-AEPA well 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:

N/A