

Our Ref: 01.01.01.01-7315U
UKOP Doc Ref:1457108



Offshore Petroleum Regulator
for Environment
& Decommissioning

ITHACA ENERGY (UK) LIMITED
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Registered No.: SC272009

Date: 24th August 2026

Department for Energy Security &
Net Zero

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Fax

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Dear Sir / Madam

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

CAPTAIN, Captain WPP'A', DRILLING PRODUCER WELL 13/22a-C49

A screening direction for the project detailed in your application, reference DR/2669/0 (Version 3), dated 20th August 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**

CAPTAIN, Captain WPP'A', DRILLING PRODUCER WELL 13/22a-C49

DR/2669/0 (Version 3)

Whereas ITHACA ENERGY (UK) LIMITED has made an application dated 20th August 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/19048/0/GS/1.

Effective Date: 24th August 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 1 September 2026 until 31 March 2027.

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:

Not applicable

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 assessments undertaken by OPRED 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:

- Drilling of a new injection well (LM34i), which will be drilled from the Captain Wellhead Protector Platform at Area A within the 500 m safety exclusion zone.
- The LM34i well will be drilled using Water Based Mud, with a discharge of cuttings and mud to the environment.
- The LM34i well will be drilled from slot 04 and will take the place of the 13/22a-C49 production well.
- The base case is the existing C49 well will be recovered, sidetracked and re-drilled to access the Lower Captain Sands. The new well will be in 2 sections (12.25" and 8.5") with cuttings discharged to the marine environment.

- Contingency sidetracks (12.25" and 8.5") have been included to represent the worst assessment case.
- The assessment includes the completion phase of the project, and there will be no vertical seismic profiling or extended well tests carried out on the well.
- Drilling and completion operations are expected to last up to 92 days.

Description of the Project

The Captain development began production with the field tied back to a Floating, Production, Storage and Offloading Vessel (FPSO). There were 2 subsequent topside developments - a Bridge Linked platform which serves Area B and C drilling centres, and a Wellhead Protection Platform (WPP'A') which is a self-contained drilling rig position above Area A drill centre. Crude oil is exported from the FPSO via a shuttle tanker, and gas is exported and imported via the Frigg pipeline.

The proposed LM34i well will be drilled from the Captain Wellhead Protector Platform at Area A (WPP A) and is planned as a Lower Captain Sands (UCS) injection well, although the well is being completed with an electronic submersible pump for an initial flow back. The target will be drilled from slot 04 and will take the place of the C49 production well. The slot will be recovered with the C49 well abandoned by setting an 800 ft cement plug. If annulus isolation is not adequate remedial perforate, wash and cement (PWC) or casing section milling techniques may be required to re-instate barriers. A new 13-3/8" casing run will be run within the existing 16" casing, with the side track kicked off from below the 13-3/8" shoe / 16" shoe and the well drilled in two sections. All well sections will be drilled using Water Based Mud (WBM), with the mud and entrained drill cuttings discharged to the marine environment.

Contingency sidetracks have been included for the well to allow for a worst-case drilling scenario to be assessed and to account for any unforeseen mechanical or geological issues. The well will be drilled within the already established 500 m safety zone which surrounds the Captain WPP 'A' platform. Operations are expected to last up to a total of 92 days if the contingency sidetracks are drilled.

No cumulative impacts are expected to occur with any other existing or approved projects due to the selection of low bioaccumulation water-based muds, the proposed mitigation and the short duration of the project.

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

There is not likely to be any significant impact of the project on population and human health. It is not considered likely that the project will be affected by natural disasters.



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 Captain field is located in the Outer Moray Firth area, approximately 191 km west from the UK/Norwegian median line and 69 km north of the Aberdeenshire coast. Survey data shows the area to be indicative of a homogenous sediment mainly made up of sandy mud/muddy sand, which is classified as 'deep circalittoral mud'. Small, localised areas comprising sandy mud were also observed, with pebbles, cobbles and boulders, and are representative of 'deep circalittoral mixed sediments'.

Water depths across the area range from 96.5 m Lowest Astronomical Tide (LAT) in the west to 124.1 m (LAT) in the east of the area. Water depth at the Captain WPP A is 105 m LAT and the mean wave height is 1.9 m. Mean wind speed in the area is 8.6 m/s and originates from all directions though primarily from the northeast / east / southeast and south. The mean annual mean surface temperature in the area is approximately 9.5 C whilst the annual mean seabed temperature is approximately 8.5 C. The annual mean surface and near bed salinity in the area is approximately 34.8 .

Seabed scars were observed during a survey of the area and are thought to be the result of trawl scars, relic anchoring activities and associated small pull-out pits.

A survey of the area showed that epibenthic fauna was relatively sparse. The dominant epifauna were sea pens, with other species observed including Norway Lobster, starfish, brittle stars, polychaetes and gastropods. Sea pens were observed over the majority of the survey area, with densities ranging from occasional to frequent using the SACFOR scale, and burrow densities ranging from common to abundant. A SACFOR assessment concluded that the Captain area would be considered to represent the OSPAR habitat 'Sea pens and burrowing megafauna communities'. There was no evidence of ocean quahog in stills or video footage, however the grab samples taken had evidence of ocean quahog shells.

Seabed sediment type in the area may fall broadly within the habitat 'subtidal sands and gravels', which is a priority habitat in the UK. Sandy mud interspersed with boulders and cobbles are indicative of 'stony reefs' however it was concluded that the area was of low resemblance to a stony reef.

The Captain field lies within fishing designated ICES rectangle 45E8. The proposed operations will coincide with fish spawning and/or nursery activity for a number of species, including the following which are designated as priority marine features; anglerfish, blue whiting, cod, herring, ling, mackerel, Norway pout, sandeels, spurdog and whiting. Fishing effort in ICES rectangle 45E8 is considered as of moderate importance, with demersal and pelagic fishing dominating the species type. It is anticipated that the drilling of the LM34i well will not have a significant impact on the fishing industry in the area. The closest aquaculture sites and shellfish protected

areas to the Captain location are at Dornoch Firth (ca. 142 km west of the Captain WPPA location).

Minke whale, white-beaked dolphin, Atlantic white-sided dolphin and harbour porpoise have all been recorded in the vicinity of the Captain field. Densities of the species are categorised as very low with the exception of the white beaked dolphin which is low in February, July, September, October and December. Grey and harbour seals may be encountered; however it is unlikely that harbour seals frequent the area. Density maps show the mean percentage of at sea populations of grey and harbour seals in the area of the Captain field are >0.001 to $<0.025\%$, and $<0.001\%$ per 25 km² respectively.

Seabird oil sensitivity in the vicinity of the Captain field is extremely high in February, very high in December, high from April to June, and medium in September and October, and low for the remaining months.

The Captain area is not situated within any conservation areas, with the nearest area of conservation interest being the Southern Trench NC MPA which lies 45 km to the southwest. This site is designated due to a variety of biodiversity and geological features including shelf deeps, fronts, burrowed mud, minke whale, sub-glacial tunnel valleys and moraines and slide scars from submarine mass movement.

The closest wrecks to the Captain WPP A location are the non-dangerous Rhone and Sleipner wrecks, both of which are steam ships, and are located approximately 0.8 km south of the Captain WPP A.

The closest offshore wind farm is located 6.5 km to the south, with 4 other windfarms proposed within 40 km of the Captain field (8 km, 18 km, 24 km and 33 km respectively - all at pre-planning stage). The closest Innovation and Targeted Oil and Gas offshore wind project is approximately 2.2 km south of the Captain WPP A. There is a carbon storage licence (CS003) located approximately 17 km to the east of the Captain WPP A.

There are no military restrictions within the block, and the nearest MoD practice and exercise area is located 3.5 km to the west of the Captain WPP A. The closest oil and gas installation is the Bleo Holm FPSO which is 30 km to the southeast of the Captain WPP A. Shipping density within the area is considered to be low. It is not anticipated that the proposed project will have a significant impact on the wrecks, offshore wind area or the CCS project.

Given the location of the project, it is not likely that the areas identified at paragraphs 2(c)(i), (iii), (iv), (vi), (vii) of Schedule 5 to the Regulations will be affected by the change to 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 change to 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 from the change to the project on population and human health.

The proposed LM34i injection well will be drilled from the Captain WPP A and therefore within the platforms existing 500 m safety exclusion zone, which excludes unauthorised access of vessels and prohibits access to fishing vessels. Fishing activities within the area are moderate, and shipping density is considered to be low. No additional impacts to other marine users are identified as part of the drilling of well LM34i. Therefore, there are no significant effects likely in terms of physical presence from the proposed project.

Cuttings from the WBM sections will be discharged into the water column. Cuttings dispersion modelling was undertaken for the cumulative effect of all four wells to be drilled as part of the 13th Captain platform drilling campaign. Ithaca do not intend to drill one of the wells included in the dispersion modelling and have used the model to inform environmental impacts from drilling the LM34i well. The modelling assessment concluded that the cumulative effect of drilling four wells shows a maximum cuttings pile thickness of 580 mm which decreases to < 6.5 mm within approximately 311 m and <1 mm within 1000 m of the wells. Discharge of offshore chemicals associated with the drilling of the well, cementing and completion operations have been assessed as not likely to have a significant effect on the environment.

Seabed disturbance from the deposit of WBM and cuttings to the water column could result in the smothering and mortality of benthic fauna which will result in some short-term temporary impacts. Ocean quahog are sensitive to increased siltation above 30 cm, and it is predicted that this smothering may cause mortality to ocean quahog if present in the area. The sea pen and burrowed mud habitats are also likely to be sensitive to smothering above 30 cm, the area of which is likely to extend to approximately 10 m from the release location. Burrowed mud habitats are also used by the Norway Lobster, which are considered likely to spawn within the vicinity of the LM34i well. It has however been shown that the Norway Lobster are tolerant to smothering and have been assessed as not sensitive to an increase in suspended sediment. Given the small area of impact and the discharge of the WBM to the water column, there is the potential for mortality of individual ocean quahog if present in the area, and the potential to effect sea pens and burrowing megafauna. However, it is not expected to affect the population levels across the North Sea and it is expected that the benthic communities will regenerate in the area over time. Cuttings deposition is unlikely to have a significant impact on the environment.

Noise generated from the project activities will not be significant, and it is concluded that the project is not expected to have a likely significant effect in relation to harbour porpoise and the supporting habitats and prey.

There are no expected transboundary effects from the proposal to drill the LM34i well. The nearest boundary (UK/Norwegian median) is located approximately 191 km

from the proposed well location. It is not considered likely that any planned operational discharge (cuttings and chemicals) will be detectable at this distance from the well location.

The well to be drilled is an injector well although the well is being completed with an electronic submersible pump for an initial flow back. An assessment has been included within the project proposal to assess as a worst case, an uncontrolled well blow out from the Captain field, and the subsequent potential for a Major Environmental Incident (MEI). The assessment concluded that there is a potential for an MEI to occur, however the risk of an oil spill event as a result of a well blow out from the LM34i well is minimal, and the developer has suitable mitigation in place to prevent such an occurrence.

The proposed drilling operation is being undertaken at the Captain WPP 'A' platform, and will use existing power generation equipment. No extra vessel movements or helicopter flights will be required for the drilling operations. Atmospheric emissions are regulated under the platforms PPC and ETS Permits. Any increase in atmospheric emissions are expected to rapidly disperse and are not likely to have a significant impact.

There are no known wrecks of historical importance or military activity in the vicinity of the Captain field and the proposed operations are unlikely to impact the proposed offshore wind farm project areas. The drilling operations are in accordance with the National Marine Plan for Scotland's objectives and policies.

It is considered that the drilling activities for the Captain LM34i well is not likely to have a significant impact on other offshore activities or other users of the sea and no 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