

Our Ref: 01.01.01.01-7270U
UKOP Doc Ref:1453960



Offshore Petroleum Regulator
for Environment
& Decommissioning

BP EXPLORATION OPERATING COMPANY LIMITED
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MIDDLESEX
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Registered No.: 00305943

Date: 23rd July 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
PIPELINE PLAAAA**

A screening direction for the project detailed in your application, reference PL/2661/0 (Version 2), dated 15th 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

Signature Not Verified

Digitally signed by Department for Energy
Security and Net Zero
Date: 2026.07.23 07:13:40 BST
Reason: On behalf of the Secretary of State
Location: Offshore Petroleum Regulator for
Environment and Decommissioning



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

**SCREENING DIRECTION CONFIRMING THAT AN ENVIRONMENTAL IMPACT
ASSESSMENT IS NOT REQUIRED**

PIPELINE PLAAAA

PL/2661/0 (Version 2)

Whereas BP EXPLORATION OPERATING COMPANY LIMITED has made an application dated 15th 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 projects as detailed in the applications, PA/6023, PA/6027, PA/6044 and PA/6045.

Effective Date: 23rd July 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 July 2026 until 31 December 2026.

2 Commencement and completion of the project

The holder of the screening direction must confirm the dates of commencement and completion of the project covered by the screening direction. Notification should be sent by email to the Environmental Management Team Mailbox: opred@energysecurity.gov.uk

3 Nature of stabilisation or protection materials

Grout bags deposits

162.5 tonnes of grout contained within 25 kilogramme capacity biodegradable bags. (The number of bags deposited should be the minimum required to provide the necessary protection, and any surplus bags must be returned to land).

4 Location of pipeline and stabilisation or protection materials

Within an area bounded by the coordinates as detailed within the application.

5 Prevention of pollution

The holder of the screening direction must ensure that appropriate measures are taken to minimise discharges, emissions and waste, in particular through the appropriate use of technology; and to ensure that necessary measures are taken to prevent incidents affecting the environment or, where they occur, to limit their consequences in relation to the environment.

6 Inspections

Should the Department consider it necessary or expedient for an inspector appointed by the Secretary of State to investigate whether the conditions of the screening direction are being complied with, the holder of the screening direction shall afford the inspector with such facilities and assistance as the inspector considers necessary to exercise the powers conferred by the regulations. The holder of the screening

direction shall additionally ensure that copies (electronic or paper) of the screening direction and any other relevant documents are available for inspection by the inspector at:

- a) the premises of the holder of the screening direction; and
- b) the facilities undertaking the project covered by the screening direction.

7 Monitoring

The results of any pre or post-placement surveys carried out to confirm the necessity for the deposits covered by the screening direction and/or to confirm the accurate positioning of the stabilisation or protection materials, should be forwarded to the Department following completion of the surveys

8 Check monitoring

Should the Department consider it necessary or expedient to undertake an independent monitoring programme to assess the impact of the project covered by the screening direction, the screening direction holder shall afford the Department with such facilities and assistance as the Department considers necessary to undertake the work.

9 Atmospheric emissions returns

Following completion of the project covered by the screening direction, the holder of the screening direction shall report all relevant atmospheric emissions, such as combustion emissions, using the appropriate Environmental Emissions Monitoring System (EEMS) reporting forms.

10 Deposit returns

The holder of the screening direction shall submit a report to the Department following completion of the deposit covered by the screening direction, confirming the quantity of materials deposited and the estimated area of impact, using the appropriate Environmental Emissions Monitoring System (EEMS) reporting form. Where no deposits are made, a 'nil' return is required.

11 Unauthorised deposits

Following completion of the project covered by the screening direction, the holder of the screening direction shall recover any materials accidentally or temporarily deposited on the seabed, such as debris, temporary containers, structures or deposits, or scientific instruments, and shall return the materials to land. If it is not possible to recover any of these deposits, full details of the materials remaining on the seabed must be reported to the Department in accordance with the requirements of Petroleum Operations Notice No.2 (PON2).

12 Screening direction variation



In the event that the holder of the screening direction proposes changes to any of the particulars detailed in the application for a screening direction, the holder must notify the Department immediately and submit an application for a post screening direction amendment. The post screening direction must be in place prior to the amended proposals taking effect.

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COMMENTS ON THE APPLICATION FOR SCREENING DIRECTION

Section 1

The attention of screening direction holders is drawn to the following provisions regarding The Offshore Oil and Gas Exploration, Production, Unloading and Storage (Environmental Impact Assessment) Regulations 2020.

1) You are deemed to have satisfied yourself that there are no barriers, legal or otherwise, to the carrying out of the project covered by the screening direction. The issue of a screening direction does not absolve the screening direction holder from obtaining such authorisations, consents etc that may be required under any other legislation.

2) The Department would draw your attention to the following comments:

NA

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

The project involves:

- Machar production EFL changeout
- Machar waterflood manifold EFL changeout
- STARS installation on W126
- Machar production manifold MPFM changeout.

The proposed operations are planned to commence on 25 July 2026, will be undertaken by the Deep Discoverer Dive Support Vessel and are expected to take approximately 17 days, with the permit end date requested to 31 December 2026 to allow for operational and weather delays.

Description of the project

The project - Machar production EFL changeout - involves fault finding and

remediation to the Machar East P7 power channel at the East towhead due to low IR. The locations of suspected failed EFLs at Machar East are listed below:

W129 EFL jumper (PL6396)

W196 Well Supply EFL jumper (PLU3130)

The existing jumpers are planned to be disconnected, whilst not disturbing any of the grout bags currently protecting them. For safety reasons the existing jumpers will be recovered during future decommissioning activity. Divers will place grout bags down to protect newly installed EFLs.

The project - Machar waterflood manifold EFL changeout - involves fault finding and remediation to the Machar waterflood manifold P5 and P6 power channels at the waterflood manifold, due to low IR. The EFL jumpers will likely require replacement to address the low IR faults. The locations of suspected failed EFLs at the Machar waterflood manifold are listed below:

W127 EFL (PL6407)

W128 EFL (PL6406)

Gas Lift Subsea Control Module (GLSCM) EFL (PL4709)

Umbilical Termination Assembly (UTA) to Machar Waterflood Manifold EFL (PL3957)

W126 EFL (PL4115)

W180 EFL (PL4708)

W182 EFL (PL6405)

GLSCM EFL (PL5026)

UTA to Machar Waterflood Manifold EFL (PL3956)

The faulty EFLs may need to be replaced with new jumpers as required to remedy the low IR faults. For safety reasons the existing jumpers will be recovered during future decommissioning activity. Divers will place grout bags down to protect newly installed EFLs.

The project - STARS Installation - involves reinstating platform control. Divers will carry out the installation of a STARS tool. Controls (hydraulics) to the STARS tool will break into the existing actuator function line through the W126 tree bridging plate. The auxiliary skid will be installed alongside W126 tree, and a bundle of hydraulic jumpers (PLU6773) will be installed to connect the skid to the tree bridging plate. Divers will place grout bags to protect PLU6773 after installation.

The project - Machar production manifold MPFM changeout - involves replacement of the existing non-operational MPFM at the Machar production manifold. The manifold will be flushed from ETAP and barrier tested prior to disconnection, the existing MPFM will be recovered and a new MPFM installed, and the system will then be leak tested prior to start-up. Two new EFLs will be installed to connect the newly installed MPFM to wells W120 (PL6722) and W121 (PL6770), and the existing well supply EFL between the Machar production manifold and well W121 (PL4780) will be replaced with a new EFL (PL6771).

Location of 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:

All of the operations will be carried out in the Machar field. The Eastern Trough Area Project (ETAP) is an integrated development of nine oil and gas fields; of which Machar is one of these fields. The Machar field is located in Block 23/26a of the United Kingdom Continental Shelf (UKCS), approximately 236 km east of the Scottish coastline and 17 km west of the UK/Norway boundary line.

The proposed operations will be carried out in water depths of approximately 84 m. The annual mean significant wave height ranges from 2.11 -2.40 m. The mean residual currents in the area are 0.1 m/s.

The sediment found at the Machar field is dominated by clayey sand with areas of gravelly sand. A number of boulders were identified across the site with a significant number of debris or other anthropogenic targets in the vicinity of the infrastructure.

The Gardline (2009) environmental survey found the benthic community to be variable across the field with abundances at each station low to moderate and of low diversity. However, a number of polychaete taxa were commonly found across the Machar field, with the most dominant being *Paramphinome jeffreysii*, and *Galathowenruncatata*. Similar results from the Gardline (2012) survey found the Machar area dominated by polychaete annelids with the polychaete *Paramphinome jeffreysii* and juvenile echinoderm *Ophiura* being the most dominant, accounting for 33% of the individuals recorded. There was little variation in the diversity and distribution of taxa and individuals found between the majority of stations in the survey (Gardline, 2012). The Machar field is located within the Priority Marine Feature (PMF) habitat 'offshore subtidal sands and gravels', the preferred habitat of the bivalve mollusc ocean quahog (*Arctica islandica*) which is a PMF and an Oslo and Paris Convention (OSPAR) (2008) 'threatened and/or declining species' (NMPi, 2025). One adult ocean quahog was recorded within the Machar survey area (Gardline, 2012), similarly one individual ocean quahog was identified in the Marnock field survey (Fugro, 2019).

No confirmed Annex I habitats were recorded in the area of proposed operations during the available surveys; however, historic survey information indicates possible methane-derived authigenic carbonate and pockmark/seepage features in the wider Machar area, although the Annex I habitat "submarine structures made by leaking gases" has not been confirmed. Sea pens and burrowing megafauna communities have been recorded in nearby fields, but not within the Machar field surveys.

The closest offshore protected area to the proposed operations is the East of Gannet and Montrose NCMPA, located approximately 29 km west.

ICES rectangle 43F2 is located within an area of high nursery intensity for cod (*Gadus morhua*) and high concentration spawning for mackerel (*Scomber scombrus*)

) and Norway pout (*Trisopterus esmarkii*). Of the species recorded to spawn in the area, sandeel and plaice use the seabed directly for spawning; however, the Machar seabed is mainly clayey sand with areas of gravelly sand and is not considered preferred sandeel or coastal plaice spawning habitat.

Seabird sensitivity in the region of the Machar field is low for most of the year but with a period of high sensitivity in September and October.

Harbour porpoise, minke whale, Atlantic white-sided dolphin, Risso's dolphin, bottlenose dolphin and white-beaked dolphin have been recorded in the vicinity of the proposed operations. Since the proposed operations are located approximately 236 km offshore, grey and harbour seals may be encountered from time to time but it is not likely that they use the area with any regularity or in great numbers.

ICES rectangle 43F2 is disclosive for all targeted species types, including demersal, pelagic and shellfish species, indicating that very low numbers of fish were landed.

There are a number of installations located within the vicinity of the proposed operations including; Erskine platform is 4.7 km southwest, Shearwater A platform is 9.6 km southwest and Shearwater C platform is 9.7 km southwest.

The proposed operations are located in areas of very low vessel traffic. There are no military practice or exercise areas in the vicinity of the proposed operations. The nearest submarine cable to the proposed area of operations is an unnamed telecom cable located approximately 5 km northwest. There are 13 non-dangerous wrecks within a 10 km radius of the Machar area. There are no historical Marine Protected Areas (MPA) near the proposed operations.

The Machar field is located within the offshore wind Innovation and Targeted Oil and Gas (INTOG) area E-a and approximately 25 km east of an INTOG Application area for floating wind. The Culzean consented application, applied for by TotalEnergies E&P UK, is located approximately 17 km northwest of the proposed operations. The Cenosis development by Flotation Energy and Vrggrnn is in pre-planning and is located approximately 29.5 km northwest of the proposed operations.

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.



Seabed disturbance will result from permanent deposits, including grout bags and the W126 STARS skid, and temporary deposits including work baskets, carousels, dead man anchors and the MPFM installation frame. The estimated total direct area of seabed affected is approximately 0.002 km², comprising approximately 0.00118 km² from permanent deposits and 0.000821 km² from temporary deposits. This footprint is small and localised. Although some mortality of benthic individuals may occur, impacts to benthic habitats, sea pens, ocean quahog or fish species at population level are not expected, given the limited footprint and the availability of similar surrounding seabed.

The nearest protected area, East of Gannet and Montrose Nature Conservation Marine Protected Area, at 29 km distance is very unlikely for seabed impacts to occur from these operations.

Risk assessment concluded that chemical discharges associated with the operations are not considered to present a significant impact to the marine environment. It is expected that the chemicals discharged during the planned operations are likely to be diluted quickly and rapidly dispersed.

Residual hydrocarbon discharges may occur during depressurisation and MPFM disconnection. The worst-case assessment identifies up to 8.27 kg of hydrocarbons during depressurisation and 12.3 kg during MPFM changeout, following system conditioning with methanol. Given the 84 m water depth and residual current of approximately 0.1 m/s, these discharges are expected to disperse rapidly and are not considered significant.

Atmospheric emissions from the Deep Discoverer DSV have been assessed based on 17 days on site and total fuel use of approximately 255 tonnes. The proposed operations are estimated to generate approximately 808 tonnes of CO₂ and approximately 835 tonnes CO₂e when other greenhouse gases are included. This represents approximately 0.004% of total UK offshore annual emissions and is expected to be short-lived, rapidly dispersed and not significant.

Operations will take place within established 500 m exclusion zones. Collision risk and the potential to disrupt fishing effort are considered low; therefore, significant effects on other sea users are not expected.

The potential for cumulative impacts from marine discharges, atmospheric emissions and seabed disturbance has been considered. The vessel is also expected to undertake related operations at Monan, approximately 29 km northwest of Machar. The cumulative atmospheric contribution is estimated at approximately 1,178.23 tonnes CO₂e, and cumulative seabed disturbance is estimated at approximately 0.0025 km². These contributions are small, spatially discrete and not considered significant.

The operations are 17 km from the UK / Norway boundary line and thus transboundary effects are considered unlikely.

The main risk of accidental release of hydrocarbons is resulting from a loss of diesel inventory from a vessel. The assessment showed that the probability of a diesel spill from a vessel involved in the project is very low, with numerous mitigation measures and procedures in place. It is concluded that an accidental release of a hydrocarbon during the project is not considered to have the potential to cause a major environmental incident (MEI). Therefore, the risk of an oil spill event that could have a significant impact on the environment is minimised.

The proposed operations are in accordance with the National Marine Plan for Scotland's objectives and policies.

2) 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.

3) 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.