



Department
of Energy &
Climate Change

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Registered Company Number: 03949599

Attention of
ATP Oil & Gas (UK) Ltd
Victoria House
London Square
Cross Lanes
Guildford
GUU 1UJ

June 14, 2013

Dear Sirs

OPPC TERM PERMIT – T01260.01

With reference to your OPPC Application for **Kilmar** dated **April 19, 2013**, please find attached the requested permit.

This permit includes an amendment to Schedule 1a (Section 6.1) and replaces the term permit issued on April 24, 2013. Please destroy any copies you hold of the permit issued on April 24, 2013.

Should you have any queries concerning the issue of this permit, or its contents then please do not hesitate to contact your assigned Environmental Inspector via the offshore.inspectorate@decc.gsi.gov.uk mailbox.

Yours sincerely

Environmental Administrator

THE PERMIT AND PERMIT SCHEDULES

THE OFFSHORE PETROLEUM ACTIVITIES (OIL POLLUTION PREVENTION AND CONTROL) REGULATIONS 2005 (AS AMENDED)

TERM PERMIT

Kilmar

DECC Ref No: T01260.01

WHEREAS **ATP Oil & Gas (UK) Ltd** has submitted an application dated **April 19, 2013** under The Offshore Petroleum Activities (Oil Pollution Prevention and Control) Regulations 2005 ("the Regulations"); and

WHEREAS the Secretary of State has considered the application submitted by **ATP Oil & Gas (UK) Ltd** whose registered company number is **03949599**.

IT IS HEREBY AGREED AS FOLLOWS-

The Secretary of State, in exercise of his powers under regulation 4 of the Regulations, permits **ATP Oil & Gas (UK) Ltd** whose registered company number is **03949599**, to discharge those oils to which reference is made in the above mentioned application, subject to the conditions specified in the attached schedule(s), namely:

- GENERAL PERMIT CONDITIONS
- 1a PRODUCED WATER DISCHARGES TO SEA CONTAINING MORE THAN 2 TONNES OF DISPERSED OIL PER YEAR

For and on behalf of the Secretary of State

Inspector Appointed by the Secretary Of State

June 14, 2013

**THE OFFSHORE PETROLEUM ACTIVITIES (OIL POLLUTION PREVENTION AND
CONTROL) REGULATIONS 2005 (AS AMENDED)**

SCHEDULE OF GENERAL PERMIT CONDITIONS

The grant of the permit is conditional upon the permit holder, or any contractor duly appointed by the permit holder or by a third party, complying with the following general conditions.

1 Permit validity

The permit shall be valid from April 28, 2013 to October 28, 2013.

2 Permitted discharges

The permit holder shall ensure that all oil to be discharged during the course of the operations covered by the permit is detailed in the permit application. The permit holder or any contractor duly appointed by the permit holder or by a third party shall ensure that those arrangements and procedures described in the permit application, on which the permit was granted, are followed, and oil is discharged in accordance with the conditions set out in this [and the following] schedule[s].

3 Awareness and display of permit and schedule

The permit holder, or any contractor duly appointed by the permit holder or a by third party, shall ensure that copies of the permit and associated schedules are displayed on the facilities undertaking the operations covered by the permit, and persons involved in the permitted discharges shall be made aware of the conditions therein.

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 permit are being complied with, the permit holder, or any contractor duly appointed by the permit holder or by a third party, shall afford the Inspector such facilities and assistance as the Inspector considers necessary to exercise the powers conferred by the regulations. The permit holder, or any contractor duly appointed by the permit holder or a by third party, shall additionally ensure that copies (electronic or paper) of the permit, the associated schedules and any other relevant documents are available for inspection by the Inspector at:

- a) the premises of the permit holder, or any contractor duly appointed by the permit holder or by a third party; and
- b) the facilities undertaking the operations covered by the permit.

5 Monitoring

Should the Department consider it necessary or expedient to undertake an independent monitoring programme of oil discharges undertaken during the course of the operations covered by the permit, the permit holder, or any contractor duly appointed by the permit holder or by a third party, shall afford the Department such facilities and assistance as the Department considers necessary to undertake the work.

6 Permit review

The permit shall be subject to regular formal review. The minimum frequency of review for a life permit will be every three years, and the Department will contact the permit holder, or any contractor duly appointed by the permit holder or by a third party, at least three months prior to a proposed review to confirm the arrangements. The permit holder, or any contractor duly appointed by the permit holder or by a third party, shall provide the Department with any information that the Department considers necessary to undertake a proposed review.

7 Permit variation

In the event of the permit holder, or any contractor duly appointed by the permit holder or by a third party becoming aware that any of the information on which the permit was granted may change or will change, they must notify the Department immediately, either in writing or by e-mail <mailto:offshore.inspectorate@decc.gsi.gov.uk>. Where a permit holder, or any contractor duly appointed by the permit holder or by a third party, wishes any of the particulars detailed in the permit to be altered, the permit holder, or any contractor duly appointed by the permit holder or by a third party, must notify the Department immediately, either in writing or by e-mail, and request a variation to the oil discharge permit in accordance with the Guidance Notes.

8 Un-permitted discharges

In the event of an oil being discharged to sea without a permit being in place, or as a result of any accidental or unplanned release, or as a result of a discharge that is undertaken for the purpose of securing the safety of any person (*force majeure*) the permit holder, or any contractor duly appointed by the permit holder or by a third party, must notify the Department or any other relevant authority using a PON1 in accordance with associated PON1 guidance and/or as directed by any specific permit schedule condition.

**THE OFFSHORE PETROLEUM ACTIVITIES (OIL POLLUTION PREVENTION AND
CONTROL) REGULATIONS 2005 (AS AMENDED)**

SCHEDULE 1a PERMIT CONDITIONS

**PRODUCED WATER DISCHARGES TO SEA CONTAINING MORE THAN 2 TONNES OF
DISPERSED OIL PER YEAR**

**The grant of the permit is conditional upon the permit holder, or any contractor
duly appointed by the permit holder or by a third party, complying with the
following conditions.**

1 Schedule validity

This schedule shall be valid from **April 28, 2013 to October 28, 2013.**

2 Schedule scope

2.1 This schedule shall be valid for the discharge of oil in produced water from the **Kilmar Platform** as detailed within the permit application.

2.2 The conditions of this permit shall apply to each individual discharge as detailed in 2.1.

2.3 The permit holder or any contractor duly appointed by the permit holder or by a third party, shall ensure that the nature and quantities of dispersed oil in produced water discharged during the course of the operations covered by the permit schedule are as detailed in the permit application, and that the discharges are undertaken in accordance with the conditions detailed in that permit application.

3 Permitted concentration and quantity of dispersed oil

3.1 The permit holder or any contractor duly appointed by the permit holder or by a third party, shall ensure that the **monthly average** concentration of dispersed oil in the produced water discharge does not exceed **30 mg/l**. The average concentration shall be determined each calendar month using the methods detailed in Conditions 6 and 8 of this schedule.

3.2 The permit holder or any contractor duly appointed by the permit holder or by a third party, shall ensure that the **maximum** concentration of dispersed oil in produced water discharged shall not exceed **100 mg/l** at any time as determined by the Department's approved method detailed in Condition 6 of this schedule.

3.3 The permit holder or any contractor duly appointed by the permit holder or by a third party, shall ensure that the quantity of dispersed oil in produced water discharged does not exceed 1 tonne in any 12 hour period.

3.4 The permit holder or any contractor duly appointed by the permit holder or by a third party, shall ensure that the total weight of dispersed oil in produced water discharged each calendar year does not exceed the amount stated in the permit application.

3.5 In the event that the permit holder or any contractor duly appointed by the permit holder or by a third party, becomes aware that the annual discharge of dispersed oil in produced water might exceed the quantity detailed in the permit application by more than 10%, the permit holder must submit a discharge permit application variation to the Department, and seek the Department's approval.

4 Notification requirements

4.1 In the event that the **monthly average** concentration of dispersed oil in produced water exceeds **30 mg/l**, the permit holder or any contractor duly appointed by the permit holder or a third party, shall notify the Department, using the OPPC non-compliance notification form, within two working days of submission of the monthly returns required under Condition 9 of this schedule.

4.2 In the event that the **maximum** concentration of dispersed oil in produced water exceeds **100 mg/l**, the permit holder or any contractor duly appointed by the permit holder or by a third party, shall notify the Department within twenty four hours of the non-compliance being identified using the OPPC non-compliance notification form or in a time period agreed in writing with the Department.

4.3 In the event that the annual discharge of dispersed oil in produced water exceeds the quantity detailed in the permit application, the permit holder or any contractor duly appointed by the permit holder or by a third party, shall notify the Department within two weeks of the non-compliance being identified using the OPPC non-compliance notification form.

4.4 A PON1 for a permitted discharge shall be completed and forwarded to the required authorities when the criteria for a PON1, as detailed in the PON1 guidance, are met.

4.5 If the permit holder or any contractor duly appointed by the permit holder or by a third party becomes aware of any factor that has prevented compliance with any condition of this schedule then the permit holder or any contractor duly appointed by the permit holder or by a third party shall notify the Department using the OPPC non-compliance notification form.

4.6 For further information in relation to the submission of an OPPC non-compliance notification form or a PON1, the permit holder or any contractor duly appointed by the permit holder or by a third party, should consult the guidance issued by the Department to accompany the relevant notification forms.

5 Permitted locations of discharges

The permit holder or any contractor duly appointed by the permit holder or by a third party, shall ensure that the discharges are undertaken only at the location(s) detailed in the permit application, and at the depths specified in the permit application.

6 Sampling and analysis of discharges

6.1 The permit holder or any contractor duly appointed by the permit holder or by a third party, shall collect samples of the produced water at the frequency specified in the permit application, using the sample points identified in the permit application.

6.2 Additional sample(s) shall be taken at the time when the requirement for a PON1, in accordance with Condition 4.4, has been identified.

6.3 The permit holder or any contractor duly appointed by the permit holder or by a third party, shall ensure that each sample collected under Condition 6.1 and 6.2 is analysed to determine the dispersed oil content in accordance with the current version of the Department's Guidance Notes for "The Sampling and Analysis of Produced Water and Other Hydrocarbon Discharges".

6.4 The permit holder or any contractor duly appointed by the permit holder or by a third party, shall additionally collect samples of the produced water on a bi-annual basis, at approximately six monthly intervals, using the sample points identified in the permit application.

6.5 The permit holder or any contractor duly appointed by the permit holder or by a third party, shall ensure that each sample collected under Condition 6.4 is analysed to determine the content of the additional constituents prescribed by the Department, in accordance with the current version of the Department's Guidance Notes for "The Sampling and Analysis of Produced Water and Other Hydrocarbon Discharges".

7 Quantification of volume of produced water discharged

The permit holder or any contractor duly appointed by the permit holder or by a third party, shall measure or calculate the volume of produced water discharged (litres) between each sampling occasion with a measurement uncertainty of $\pm 1.10\%$ on volume.

8 Quantification of weight and concentration of dispersed oil in produced water discharged

8.1 The weight (kilogrammes) of dispersed oil in produced water discharged shall be calculated between each sampling occasion using the method described in Condition 8.2.

8.2 The weight of dispersed oil discharged between each sampling occasion shall be determined by taking the result of each analysis undertaken to determine the dispersed oil content (mg/l) and multiplying it by the volume of the produced water discharged from the time of collection of the sample for the analysis until time of collection of the next sample for analysis.

8.3 Where analyses to determine the dispersed oil content are undertaken more frequently than twice daily, all the analytical results and the discharge volumes between the sample collections shall be used to determine the weight of dispersed oil discharged.

8.4 The **monthly average** concentration of dispersed oil in produced water (mg/l) shall be calculated by summing the total weight of dispersed oil discharged each calendar month, and dividing by the total volume of produced water discharged during that month.

8.5 The **annual average** concentration of dispersed oil in produced water (mg/l) shall be calculated by summing the total weight of dispersed oil discharged during each calendar year, and dividing by the total volume of produced water discharged during that year.

9 Submission of permit returns

9.1 The permit holder or any contractor duly appointed by the permit holder or by a third party, shall, by the 16th of each calendar month, submit details to the Department of the discharges of produced water during the preceding calendar month. The details shall be submitted via the Environmental Emissions Monitoring System (EEMS), and be in accordance with the requirements described in the relevant EEMS returns form and associated guidance.

9.2 The permit holder or any contractor duly appointed by the permit holder or by a third party, shall, by the 1 September of each calendar year, submit details to the Department of the results of the biannual analyses of the additional constituents undertaken during the period January to June of that calendar year; and by the 1 March of each calendar year, submit details to the Department of the results of the biannual analyses of the additional constituents undertaken during the period July to December of the preceding calendar year. The details shall be submitted via the Environmental Emissions Monitoring System (EEMS), and be in accordance with the requirements described in the relevant EEMS returns form and associated guidance.

10 Maintenance of records

10.1 The permit holder or any contractor duly appointed by the permit holder or by a third party, shall maintain a hand written record, within the laboratory where the analysis is undertaken of:

- The date and time when each sample was collected;
- The result of the dispersed oil in produced water concentration (mg/l) for each sample; and
- The name of the person undertaking each sample analysis.

A hand written record will not be required where samples are analysed and recorded onshore at a laboratory with LIMS or similar system in place.

10.2 The permit holder or any contractor duly appointed by the permit holder or by a third party, shall ensure that a written record is maintained on the offshore installation, detailing the following information:

- The date and time when each sample was collected;
- The result of each analysis undertaken to determine the dispersed oil in produced water concentration in each sample (mg/l);
- The volume of produced water discharged (litres) between each sampling occasion;
- The total volume of produced water discharged (litres) during each calendar month;
- The total weight of dispersed oil discharged (kilogrammes) during each calendar month;
- The average dispersed oil concentration (mg/l) during each calendar month;
- The total weight of dispersed oil discharged (kilogrammes) during each calendar year;
- The total volume of produced water discharged (litres) during each calendar year;
- The average dispersed oil concentration (mg/l) during each calendar year;

10.3 Where the offshore installation to which the record relates is a Normally Unattended Installation (NUI), the permit holder or any contractor duly appointed by the permit holder or by a third party, may maintain records specified in 10.2 at an alternative location and shall notify the Department of the alternative location.

10.4 Where the records detailed in Conditions 10.2 are maintained solely in electronic form, secure systems shall be provided so that all changes are recorded and original entries are not deleted.

10.5 The permit holder or any contractor duly appointed by the permit holder or by a third party, shall ensure that where a secure electronic system is unavailable as detailed in Condition 10.4, or where written records are maintained, the person in charge of the operation shall sign a true copy of the records for the time period over which they have responsibility.

10.6 The permit holder or any contractor duly appointed by the permit holder or by a third party, shall ensure that records are maintained at any laboratory where any analyses are carried out for the purposes of validation, calibration or correlation. The following information must be detailed:

- The date when each sample was collected or synthetic oil in water standard made up.
- The name of the person collecting each sample or making up the synthetic oil in water standard.
- The result of each analysis undertaken and any associated calculations or graphs.
- The name of the person undertaking each analysis and the name of the person involved in any calculations or graphs.
- The name of the person in charge of the analysis and any associated calculations or graphs.

10.7 The records detailed in Conditions 10 shall be made available to the Department on request, and shall be retained for a period of five calendar years after the calendar year to which they relate.

11 Training

11.1 The permit holder or any contractor duly appointed by the permit holder or by a third party, shall ensure that all persons undertaking activities to comply with any schedule condition be provided with sufficient information, instruction and training to undertake the tasks.

11.2 The permit holder or any contractor duly appointed by the permit holder or by a third party, shall ensure that records of such training shall be retained and made available to the Department on request.

12 Compliance arrangements

The permit holder or any contractor duly appointed by the permit holder or by a third party, shall have arrangements in place to ensure the accuracy and correctness of all activities undertaken in accordance with this schedule.