



Offshore Petroleum Regulator  
for Environment & Decommissioning

D/4264/2021

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04 February 2022

Dear [REDACTED]

Department for Business, Energy  
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Offshore Petroleum Regulator for  
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**THE OFFSHORE OIL AND GAS EXPLORATION, PRODUCTION, UNLOADING  
AND STORAGE (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS  
2020**

**NOTICE UNDER REGULATION 12(1)**

**Alwyn East Field Development**

The Offshore Petroleum Regulator for Environment and Decommissioning (“OPRED”) acting on behalf of the Secretary of State for Business, Energy and Industrial Strategy (“the Secretary of State”) is currently considering the Environmental Statement (“ES”) and the representations received from the public consultation process in relation to the above project. TotalEnergies E&P UK Ltd is hereby required to provide further information in relation to the following:

1. **2.3 Consideration of Alternatives** (page 29) – With regards to the drill cuttings generated it is explained that there is insufficient reinjection capacity at North Alwyn for the Alwyn East arisings so skip and ship is the primary option, with reinjection as a contingency option for poor weather scenarios. Please could the applicant confirm whether a proportion of the cuttings could be reinjected on a planned basis, out with any contingency situations? What is the remaining capacity of the cuttings disposal well versus the estimated cuttings arising from Alwyn East.
2. **2.4.4 Well clean-up & testing** (page 32) – This firstly describes testing well fluids via the test separator before detailing testing involving flaring 128 tonnes of gas. Please can the applicant confirm that any oil/liquid hydrocarbons are separated out before the well test flaring in this instance? However, if oil/liquid hydrocarbons might be flared during the well test these should be accounted for emissions calculations (in Chapter 5).
3. **2.5.3 Produced Water Processing** (page 34) – It is indicated that there is 90% efficiency of the produced water reinjection system (PWRI) and a 10% discharge of produced water is considered in the ES. However, we understand that there are

some issues with PWRI reliability at this time therefore can the applicant confirm that the assumptions made based on historic data continue to be appropriate?

4. **5.4 Description & Quantification of Potential Emissions** (pages 71-76) – Please can the applicant check and confirm the emissions calculations and results for the project as the Department has not been able to replicate them? Please revisit emissions calculations for drilling, production and flaring and venting. The applicant should clearly provide all the necessary input data for the calculations, e.g. it is not immediately apparent how much fuel gas the additional gas turbine for drilling operations power generation uses. There has potentially been confusion between the factors used to calculate global warming potential (from IPCC AR5) and emissions factors (from EEMS, etc) for combustion of different fuel types and also it's unclear if the emission factors for different activities have been used (e.g. plant operations versus flaring). Non-greenhouse gases (with no global warming potential) have been integrated amongst CO<sub>2</sub>, CO and CH<sub>4</sub> in the emissions data tables and so it therefore appears that they contribute to the CO<sub>2</sub>e totals.
  - a. Table 5-2 note states that the totals are based on non-rounded figures, but this did not appear to be the case when attempting to replicate the calculations.
  - b. Tables 5-3 & 5-4 both include data lines which are percentages but the table header indicates all data relates to CO<sub>2</sub>e tonnes.
  
5. **5.5 Contribution to Achieving Net Zero Target, 5.7.2 Global Climate Change & 8.2 Carbon Footprint Reduction Strategy** – The emissions from the project are considered in the context of the UK's carbon budgets in section 5.7.2 & net zero targets are discussed in 5.5 and 8.2 however the sector specific targets from the North Sea Transition Deal are not covered. The 2050 net zero target set in the Climate Change Act 2008 (2050 Target Amendment) Order 2019 is mentioned, but its evolution into specific targets for the oil and gas sector in the Energy White Paper (December 2020) and then, most relevant, the North Sea Transition Deal (March 2021) need to be accounted for. It is noted that the ES was submitted before publication of the UK Net Zero Strategy in October 2021, which replicates the oil and gas sector targets from the North Sea Transition Deal.
  - a. **5.5 Contribution to Achieving Net Zero Target** gives a series of measures in relation to the project but doesn't describe the ongoing production in terms of the staged industry targets. **8.2 Carbon Footprint Reduction Strategy** gives TotalEnergies worldwide 2050 and interim targets, but these don't align with the North Sea Transition Deal targets. Please can the applicant relate the proposed measures to the significant emission reduction of 10% in 2025, 25% in 2027, and 50% in 2030 on the pathway to net-zero by 2050.
  - b. Has the applicant considered platform electrification (or other localised solutions) for Alwyn?
  - c. There is a target to phase out high-emission assets that are unable to economically or technically reduce emissions at prevailing carbon and commodity prices. Please provide some context on this in relation to the proposed project.
  - d. 5.2 acknowledges the World Bank Zero Routine Flaring by 2030 initiative but doesn't provide any details of how it will be met at Alwyn. What are the applicants plans to address this target?

- e. 5.5 states there will be no planned change in fugitive emissions as a result of the Alwyn East well coming online, but what is the platform methane reduction strategy?
- 6. **5.7.2 Global Climate Change** - (page 78) – Please can the applicant confirm if they have considered the vulnerability of the project to climate change?
- 7. **7.5.2 Protected Sites** (page 94) – Table 7-5 includes some more distant marine protected areas (Central Fladen and North-East Shetland Channel), please can the applicant confirm that the Seas off Foula SPA and the Southern Trench NCMPA are not potentially impacted by accidental event scenarios?
- 8. **7.5.3 Plankton & fish** (page 96) – It is noted that impacts on aquaculture are considered but advise this section also considers impacts on Shellfish Water Protected Areas. Further information is available here: (<https://www.gov.scot/policies/water/protected-waters/>). The paragraph on aquaculture concludes by discussing the risk to fishing, but should this refer to the risk to aquaculture?

Your response will be reviewed, and consideration given as to whether the information provided ought to be made public because the information is directly relevant to reaching a conclusion on whether the project is likely to have a significant effect on the environment. If so, OPRED will notify TotalEnergies E&P UK Ltd under Regulation 12(3), and TotalEnergies E&P UK Ltd will have to take further steps to publish information and make provision for further public consultation under Regulations 12(5) to 12(9).

OPRED looks forward to receiving your response so that we can progress our consideration of the ES.

Yours sincerely

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**Environmental Manager**

The Offshore Petroleum Regulator for Environment and Decommissioning  
For and on behalf of the Secretary of State for Business, Energy and Industrial  
Strategy

