



Offshore Petroleum Regulator  
for Environment & Decommissioning

ES/2022/003

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Dear [REDACTED]

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

**NOTICE UNDER REGULATION 12(1)**

**Victory 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”) in relation to the above project. Corallian Energy Limited is hereby required to provide further information in relation to the following:

**General Comments**

1. Page 3-19 Table 3.8 Justification of Rock Quantity Calculation – confirm what ‘line OD’ is as it is not in the abbreviation section.
2. Page 4-13 Table 4.3 Summary of Seabed Sediment Hydrocarbon and Heavy Metal Concentration and Table 4.4 – confirm what ‘CV (%)’ and ‘SD’ is as they are not in the abbreviation section.
3. Page B-7 Table B.4 Water Column Oil Concentration Thresholds, row 3 – confirm what ‘EC’s’ is as it is not in the abbreviation section.
4. Page 4-47 Seabird Sensitivity to Oiling and Table 4.14 Seabird Sensitivity to Oiling within the Proposed Victory Area - Revised periods of concern for drilling activities based on the SOSI have been issued. Updated periods of concern for drilling is defined as any single month that presents, in a given licence block, either a very high or extremely high seabird Median Sensitivity. The period of concern for block 207/01 is October when the SOSI is 'very high'.
5. Page 12-6 Table 12.1 Mitigation Measures and Commitments Register, Ref 2 a. Seabed Disturbance – Consultees note the proposal for a detailed survey of the chosen pipeline/ umbilical routes to avoid any potential Annex I stony reef/ sensitive habitat and confirm the pipeline design. OPRED may consider attaching this as a condition should it agree to the grant of consent.

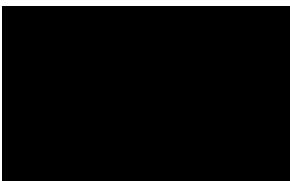
## Specific Comments

1. Page No 2-14, Table 2.7 Victory Compliance and Key Energy Transition and Net Zero Commitments and Expectations - How much more efficient is a green burner compared to a standard burner?
2. Page No 3-5, S3.3.5 Mud System, Cuttings Disposal and Chemical Use, Cement – Will Corallian be applying for contingency if cementing must be repeated, therefore does this alter the 12m3 estimated for discharge?
3. Page 3-8, Figure 3.4 Victory tie in infrastructure schematic and Page 3-22 Fig 3.16 HTT1-2 Location Schematic and Required Crossings – It currently appears that the link between the PLEM and HTTP1-2 tie in structure is shown as flexible jumper on the latter and spool on the former. Which is correct?
4. OPRED compared the production figures in the Environmental Statement (ES) and Field Development Plan (FDP) and contacted the North Sea Transition Authority (NSTA) to confirm if the Production Consent is based on the backed-out production profile as presented in the ES. The NSTA confirmed that the Production Consent is based on the wellhead profile, aligned to Page 34, Table 7 of the FDP. They queried the first year of production which is 390,684 kscm at a rate of 4341 kscm/d assuming a proposed production consent starts on 1<sup>st</sup> October 2024. OPRED informed the NSTA that the production profile presented in the ES is forecast until 2031 and the NSTA confirmed that, should consent be granted, it would be adjusted accordingly.  
As the information presented in the ES should have been based on the maximum wellhead recovery for oil and gas, not the backed-out production, the operator must review the information presented in the ES. Revised information must be presented to OPRED for it to re-assess the environmental impact of the Victory field development.
5. Page 3-27, S3.5.3 Marine Discharges - This section refers to 1.0 bbl/MMscf, is that in total or per year?
6. Page 4-20, Figure 4.7 Predicted seabed habitats in the vicinity of Victory development - Can the operator confirm where A5.45 is on the map? This is the last entry in the previous table 4.5 Summarised Habitat Classifications.
7. Page 4-57, S4.3.6 Marine Protected Areas, Faroe Shetland Sponge Belt NC MPA - This section states the sponge belt is 8km north east of Edradour manifold, should this be north west of it?
8. Page 5-6, Table 5.2 Aspects Subject to Further Assessment – 'Underwater noise emissions' – the receptors column needs to include marine mammals which then aligns it to the impact section of the ES.
9. Page 8-4, Table 8.2 Assessment criteria for species of fish from Popper et al. (2014) for pile driving stimuli – Clarify why the thresholds for 'mortality and potential mortal injury' appears to be the same as those for 'recoverable injury'.
10. Page 11-25, S11.4.9 Socio-economic Receptors, Mariculture - Where an accidental event i.e., oil spill could reach a Scottish coastline, impact on Shellfish Water Protected Areas should be considered, briefly confirm the potential impact.

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 Corallian Energy Limited under Regulation 12(3), and Corallian Energy Limited 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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[Redacted]

**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