



Offshore Petroleum Regulator
for Environment & Decommissioning

D/4273/2021

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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)

Talbot 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. Chrysaor Petroleum Company U.K. Limited is hereby required to provide further information in relation to the following:

1. Further information provided on 11 November 2022 ('the further information') discusses the results of cuttings modelling undertaken. Did the modelling include contingency WBM sections (i.e. increased cuttings quantities) that have now been applied for under the drilling screening direction applications? If an 'upper section re-drill' is being considered this should be included in the ES assessment. Additionally, the further information states that cuttings modelling was undertaken for three wells. As the ES includes provision for a potential fourth well, please quantify 'wouldn't be significantly larger' in your response for the change to the cuttings area of impact (from a fourth well).
2. The further information states that end of Talbot field life is expected *from* 10 years. The ES should assess the maximum/worst-case environmental impacts of the project and the length of field life assessed should reflect the relevant application for consent and supporting FDP (13 years). Please discuss any change to the determined impacts (including, but not necessarily limited to, relating to atmospheric emissions) on account of a 13 year field life.
3. The further information suggests alternative tie-in is still an option (as per FDP final version, V4) therefore the environmental effects of this should be assessed within the ES. Schedule 6 of the Regulations requires 'A description of the reasonable alternatives . . . studied by the developer and an indication of the main reasons for the option chosen, taking into account the effects of

the project on the environment and including a comparison of environmental effects.'

4. The further information confirms that all items are captured in Table 6:6 of the ES (summary of seabed footprint from subsea structures at Talbot) but does not confirm whether there is any additional footprint in the Fulmar MCZ not accounted for (please refer to comment #19 in Regulation 12(1) letter dated 21 October 2022).
5. Please refer to comment #21 in Regulation 12(1) letter sent 21 October 2022. Please justify why the seabed footprint figure (for locating a rig/platform) from previous applications was deemed more relevant than the current estimates within this ES. What contingencies apply to Talbot that would not apply elsewhere? This relates directly to calculation of cumulative impact (seabed footprint) within the Fulmar MCZ.
6. Comment #24 of the Regulation 12(1) letter sent 21 October 2022 requested further information on the likely erosion of the cuttings pile over time, which has not been provided. Results have not been fully considered in light of potential impacts to sensitive benthic receptors; ocean quahog are mentioned in the further information but the impact at population level is not quantified, nor is the impact on other designating features of the Fulmar MCZ discussed. What % area of the Fulmar MCZ will be impacted? Spawning sandeel is also a sensitive benthic receptor discussed in Section 4 (as having high sensitivity to changes in siltation) that has not been considered in the further information. Is a significance of 'low' (Table 12:1 of ES) still considered correct?
7. The further information suggested that the 2021 appraisal well was the only other Talbot well drilled within the Fulmar MCZ, but the cumulative impact on the Fulmar MCZ has not been quantified. Please see comment #26 of the Regulation 12(1) letter dated 21 October 2022.
8. The further information does not answer comment #2.d. of the Regulation 12(1) letter dated 21 October 2022 on the background to 211,970 tCO₂e (embodied carbon) over the project lifecycle. How was this figure calculated?
9. Please refer to comment #33.a. of Regulation 12(1) letter dated 21 October 2022. How were 0.03% (2025) and 0.06% (2030) contributions to NSTD targets calculated?
10. Please refer to comment #33.b. of Regulation 12(1) letter dated 21 October 2022. How was 0.02% of the 6th UKCCC Carbon Budget calculated?
11. Table 8:9 of the ES compares Talbot annual emissions against UKCS oil and gas 2018 emissions, but the Talbot figure of 45,742 tCO₂e does not include 1,363 tCO₂e from vessel and helicopter operations during operations. In addition to the 2018 comparison (relevant for the NSTD) please compare against the most recent year of data available (for UKCS oil and gas emissions).

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 Chrysaor Petroleum Company U.K. Limited under Regulation 12(3), and Chrysaor Petroleum Company U.K. 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



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