Offshore Petroleum Regulator
for Environment & Decommissioning

ES/2022/006

Department for Energy Security & Net Zero

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28th April 2023

Dear [redacted]

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

NOTICE UNDER REGULATION 12(1)

Teal West Development

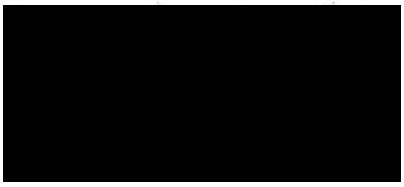
The Offshore Petroleum Regulator for Environment and Decommissioning ("OPRED") acting on behalf of the Secretary of State for Energy Security and Net Zero ("the Secretary of State") is currently considering the Environmental Statement ("ES") in relation to the above project. Anasuria Hibiscus UK Ltd is hereby required to provide further information in relation to the following:

Comment	ES REFERENCE	Original comment	New comment
1	Section 1.2. Project overview	As per the 2020 EIA Regulations and the EIA Guidance, please include the volumes of oil produced in tonnes per day and gas in m3 per day. In addition to the high case (P10), please also provide the low (P90) and mid (P50) production forecasts.	AHUK has not answered the question as specified. Please re-read the original question and provide a response accordingly.
2	Section 3.2.5 Mud System and Cuttings Discharge	Table 3-2. Taking Table 3-1 lengths to calculate volumes and subsequent densities results in cuttings densities of approximately (2.5 t/m3 - expected). However, taking the lengths reported in table 6-2 (which differ from those of Table 3-1) a density of 0.8 is obtained for cuttings, which is unexpected. Please clarify.	The response provided initiates the need for further clarity. If the modelling was undertaken using data from Table 6-2 with accompanying masses of cuttings from Table 6-4, then not enough cuttings mass has been modelled to be able to obtain a density of 2.5t/m3. Please re-visit.
3	Section 3.3.1 Overview of field layout and subsea infrastructure	Table 3-3 refers to a worst case rock berm width of 2m. How has this worst case figure been derived? Please clarify.	Table 3-3 refers to a worst case rock berm width of 2m. How and why has this worst case figure been derived? AHUK responded with '*By estimation at present* '. This answer is not detailed enough. Please expand.
4	Section 3.4.9 Flaring and Venting	AHUK state "*There will be additional venting from the cargo oil tanks as a result of the additional oil production from Teal West.* " Can AHUK confirm what consideration has been made of tank vapour recovery on the FPSO?'	AHUK state, "AOC, as Duty Holder, will be developing a Anasuria Vent Reduction Strategy where tank vapour recovery will be considered." Please confirm that AOC is a member of OEUK, and therefore are producing a Methane Action Plan (MAP) which includes emissions as a result of crude oil tank loading and offloading that documents the available methane reduction opportunities and the justification for proposed methane reduction actions in alignment with NSTD policies and commitments.
5	Section 6.4	The section describes a peak produced water rate of 2,347 Te/day in year 14 but it is understood that field life is only anticipated for 10 years. Please clarify.	Reg 12(1) - AHUK's response does not wholly answer the original question. Whilst also confirming the peak produced water rate, please confirm the life of the field.
6	Section 8.5.5 Summary of Results - Underwater noise modelling	How have the distances of injury to fish been produced if no modelling has been undertaken? Please clarify.	AHUK state, "While detailed modelling of fish has not been carried out, the radius of injury for the different types of fish due to seismic survey and piling operations are presented in Table 8-8 and Table 8-9, respectively". However, AHUK's response states that noise modelling has been carried out which was used to inform the distances of injury to fish." (What is the difference between detailed modelling and non-detailed modelling. The 'how' hasn't been explained. Please re-visit the original question and comment accordingly.
7	10.4.4. Total emissions	Please clarify how carbon intensity of 14.1 kg CO2e/boe is calculated. It is not obvious from the text in this section.	Please confirm whether units are standard m3 or just m3, and where the conversion factor Mm3 to mmscf has been taken. Original number provided was 14.1 kgCO2e/boe, now it is 11.07 kgCO2e/boe. Please clarify the rationale for this increase in efficiency. Please confirm the above is indeed for the expected/P50 production case. AHUK need to present the incremental increase for the project so that a conclusion can be given as to whether project is of low/med/high carbon intensity.
8	10.5. Management and Mitigation	AHUK state, "*Opportunities for further reduction of emissions and improvements in energy efficiency will be sought during emissions reduction reviews in subsequent design phases* ." Please clarify what subsequent design phases are planned	AHUK's wording isn't commital; 'understand' is different to 'committed'. How will AHUK align to Government's Net Zero policy; details from AOC's ERAP may be able to help provide more information.
9	Accidental Events	Please include shoreline minimum arrival time and probability plots as well as surface oiling minimum arrival time plots as per guidance quoted in the ES (OPEP guidelines).	The EIA Guidance states, "*It is recommended that the oil spill modelling and impact assessment components of the OPEP are merged with the EIA Directive requirement to consider the potential impact of accidents and natural disasters* ." Please re-visit the original question and action accordingly.
10	Appendix A - Commitments Register	As per OPRED Guidance, please indicate **how** and **when** the measures will be implemented and confirm **lines of responsibility** for ensuring implementation.	AHUK's response provided is ambiguous. AHUK have not addressed the original comment; timelines have not been stated - high level estimates would be useful, for example, within X months/years of a given milestone. OPRED needs to understand as a company how /when AHUK will meet their expectations.
11	Net Zero	Please explain how AHUK/AOC intend to achieve zero routine flaring by 2030.	Zero routine target is legal target. What is the timeline for AHUK/AOC to identify zero routine flaring being in place?
12	Net Zero	How will atmospheric emissions be monitored during each stage of the proposed project?	OPRED's question is about real emissions monitoring at each stage, whereas AHUK's answer is about performance management which is not the same thing. Please provide details as to how AHUK will monitor emissions at each stage of the project e.g. those vessels associated with project, emissions from MoDU etc.

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 Anasuria Hibiscus UK Ltd under Regulation 12(3), and Anasuria Hibiscus 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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The Offshore Petroleum Regulator for Environment and Decommissioning
For and on behalf of the Secretary of State for Energy Security and Net Zero