



Department for
Energy Security
& Net Zero

D/4272/2021

██████████
NEO Energy Ltd
455 Union Street
Aberdeen
AB11 6DB

17 May 2023

Dear ██████████

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

NOTICE UNDER REGULATION 12(1)

Affleck Re-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”) and the responses received from the operator following the initial request for further information in relation to the above project. NEO Energy Ltd is hereby required to provide further information in relation to the following:

1. As discussed within the ES the UK Government has committed to the World Bank’s zero routine flaring initiative by 2030. Section 10.4.4 of the ES states that ‘The introduction of Affleck fluids will require limited routine flaring on Judy. Only a marginal increase in emissions (<7,000t CO₂e over the life of field) from flaring is expected with the addition of Affleck (and the proposed Talbot project) fluids.’ It is previously stated in the OPEP that there will be no routine flaring. Please confirm whether routine flaring will be undertaken. Please confirm that no routine flaring will take place after 2030 as a result of Affleck.

The table provided in the first response (Table 10-5) uses different units in different columns i.e. Judy alone is given in Tonnes of CO₂e while other columns are in thousand Tonnes of CO₂e. Please amend.

2. Table 10-7 in the response to the further information request has 0 emissions for operation following 2034. Please provide figures up to 2037 or provide

**Department for Energy Security &
Net Zero**

Offshore Petroleum Regulator for
Environment & Decommissioning
AB1 Building
Crimon Place
Aberdeen
AB10 1BJ

Tel ██████████

www.beis.gov.uk
bst@beis.gov.uk

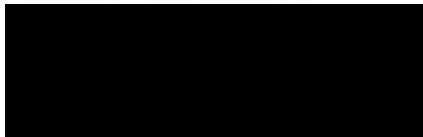
further explanation for the 0 emissions predicted.

3. Manifold – we note that the Affleck manifold is no longer proposed and on that basis the project on which the ES is based has changed, while we appreciate that the removal of the Affleck manifold will result in a reduction in the environmental impacts from the project, it is necessary to provide a clear description of the revised project and ensure that the impact is assessed accurately. Please provide the following: an updated description of the project, a summary of any changes to pipeline crossings and protection material, details of changes to seabed disturbance including impact on benthic habitats and species, changes to installation methodology and atmospheric emissions (covered in previous response).

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 NEO Energy Ltd under Regulation 12(3), and NEO Energy 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



The Offshore Petroleum Regulator for Environment and Decommissioning
For and on behalf of the Secretary of State for Energy Security and Net Zero

