



Offshore Petroleum Regulator  
for Environment & Decommissioning

ES/2022/002

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30 November 2022

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

**NOTICE UNDER REGULATION 12(1)**

**MURLACH FIELD DEVELOPMENT (redevelopment of Skua, part of the Marnock-Skua field)**

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. BP Exploration Operating Company Limited is hereby required to provide further information in relation to the following:

**Comments on further information 12(1) response**

1. Specific comments, Comment 2 – For the drill cuttings, the Department note that BPEOC has commissioned a study to address the related comments received following public consultation. Is it possible to provide a copy of this modelling study to OPRED?
2. Specific comments, Comment 24 - Table 4 – There are errors in the revised table provided – The Department calculate different values for the temporary impact and permanent impact totals for Option 4. Please review and amend as necessary.

The following comments are required to be addressed in order for the Department to see the changes occurring at ETAP so we have an overall picture of how the ETAP was performing prior to the Seagull and Murlach coming online and how it changes incrementally with each project.

3. Specific comments, Comment 10b, Table 1, 2 and 3 – Please provide production figures from 2021 for ETAP, to provide a baseline and then from

2022 so we can see how production changes with the Seagull and Murlach coming online.

4. Specific comments, Comment 19a – Table 6-9 in the ES only shows emissions to 2020, please also provide the emissions for 2021 as well as the fuel use for all years.
5. Specific comments, Comment 19b – Please provide the calculations used to determine that 2 compressors are required. Specifically, how the following was derived a) the additional load requirements and b) the additional fuel requirements as a result of the increased load.
6. Specific comments, comment 19c – Further information is required to clarify what the smaller peak is due to. Why is the proportion of gas from Murlach higher for this year?
7. ES, Section 6.3.2 – Tables 6-4 and 6-5 are useful as they provide the emissions increases due to Murlach production. However, in order for the changes from the baseline to be seen, this should include the information for the ETAP without Murlach and earlier years from 2021.
8. ES, Section 6.3.2 – Table 6-8 – The updated tables provided for the production figures (Tables 1, 2 and 3 from the BP response) are exactly what the Department would expect to see as these provide information on the ETAP itself as well as the incremental changes occurring from the Seagull and Murlach projects coming online. In order to make a comparison, and to isolate the incremental impact of Murlach, Table 6.8 should be updated to also show similar disaggregated information. This should therefore include the emissions that would occur from the ETAP without the Seagull and Murlach, the Seagull incremental emissions, and then the incremental emissions for the Murlach upside case and base case. This would make the incremental changes for each project transparent. A similar set of disaggregated data should be included for the GHG intensity from the ETAP alone, the Seagull project only and the Murlach project only (i.e. project incremental emissions / project incremental production). This should also include the emissions data from 2021-2024. If the additional columns are too much data to show in the one table, then the intensity metrics for the different projects could be split out into an additional separate table.

### **Further specific comments on ES**

1. Section 6.2.1 - First oil and gas is assumed from 2025, therefore why is there no increase in GHG emissions for this year?
2. Please provide some information on venting. Will there be an increase at ETAP when Murlach comes online or will this be within the current levels on the vent consent? Will a vent consent be required for the development phase at the Murlach site?


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 BP Exploration Operating Company Limited under Regulation 12(3), and BP Exploration Operating Company 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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**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