



Offshore Petroleum Regulator
for Environment & Decommissioning

ES/2022/002

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23 May 2023

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Dear ██████████

**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) no 2 response

1. Comment 3 –
 - a. Table 1 – The latest draft of the FDP and the information in BP’s response to our Further information letter No2 had oil figures for 2025 as 1,117 but this is now 1,120 in the updated table. Please clarify the reasons for this change.
 - b. Tables 1, 2 and 3 – The Department note that there is no change in the Murlach figures, however there is an increase in the production and produced water figures for the ETAP + Seagull case. Please clarify why this has changed? Is this increase within the current production consents?
 - c. Table 3 – The numbers are 100x less than in the FDP and in the ES. Please clarify the reasons for this change?
2. Comment 4 - In the response to our comment 4 it is stated that ‘Estimated emissions associated with flaring from Murlach are expected to remain in line with ETAP baseline performance therefore no table has been included.’ this

is the same for the fugitives and the diesel. Please clarify if by this you mean that there is expected to be no increase in these categories of emissions (from flaring, fugitives, and diesel) as a result of Murlach coming on stream? If this is not the case then we would expect to see any incremental emissions split out in the table. We note that the original ES Table 6-5 presented incremental Flaring emissions from Murlach.

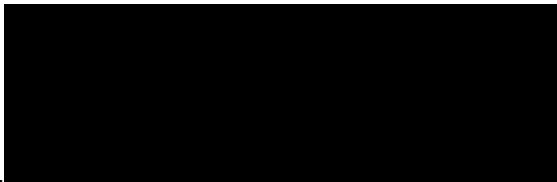
3. Comment 8 –

- a. Table 6-14 – How was the GHG intensity calculated for ETAP, Seagull and Murlach from 2025-2035? Were these averaged over the years? E.g. Using the Murlach upside numbers from the revised Tables 6-8(1) and 6-8(2), 9.8 and 8.2 is not the average. Please clarify how these numbers have been derived, is it a weighted average?
- b. It is noted that the GHG intensity in Tables 6-8 and 6-14 of the original ES for Murlach is much higher than that provided in Tables 6-8(1), 6-8(2) and 6-14 in this response. Please clarify this.

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



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

