



Offshore Petroleum Regulator
for Environment & Decommissioning

D/4260/2021

BG International Limited

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17 June 2021

Dear [REDACTED]

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


NOTICE UNDER REGULATION 12(1)

Jackdaw 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”) has now completed its review of the Environmental Statement (“ES”) and the representations received from the public consultation process in relation to the above project. BG International Limited is hereby required to provide further information in relation to the following:

1. [REDACTED]
2. The magnitude criteria (Table 4-2 of the ES) include example descriptors for each level. Please provide example descriptors for magnitude levels relating to emissions and climate? Given the nature of the impact and its effects on climate factors (and targets) when considered cumulatively with other existing or approved projects of the same nature, please explain why a magnitude level of ‘slight’ is appropriate for the impacts in relation to climate?
3. Please provide further explanation as to why Judy was not selected as the tie-back host facility, given that cost and technical viability don’t render the alternative unfeasible? The ES states that Shearwater offered (1) a slightly lower risk option in terms of brownfield modifications, and (2) that there were no significant environmental differentiators between the two options. The

latter justification seems odd given the clear benefits of avoiding significant offshore vent emissions from the amine unit and a shorter pipeline length (and seabed disturbance) requirement to that of Shearwater.

4. Given the importance of Jackdaw to the longevity of Shearwater as a functioning host facility (Section 1.1 in the ES), please explain why total emissions from Jackdaw, Shearwater, the current and forthcoming tiebacks have not been assessed in terms of cumulative impact (table 7-14 in the ES)? Further, the Elgin platform (8 km from Shearwater) represents an existing project which demonstrates a similar philosophy in terms of venting from corrosive gas treatment. Why has the cumulative effect of this project not been considered too?
5. 
6. Section 7.3.4 of the ES states "*The annual diesel fuel consumption for unmanned and manned operating modes is predicted to be 170 te and 89 te per year respectively based on the above electrical load. The total diesel consumption at WHP, including fuel required for crane operation (3.4 te per year) will be approximately 263 te per year.*" Based on the narrative in the ES why would the unmanned phases require more fuel consumption than the manned phases?
7. Section 8.3.2 of the ES does not assess the potential impacts from effectively doubling the produced water (PW) volume and oil in water when Jackdaw comes on-line, please qualify why this has been omitted or provide an assessment of the environmental effects on the environment from such an activity?
8. Can the developer provide further justification as to why they believe the magnitude criteria for the effect of PW (particularly entrained oil in PW) on the receptors should be 'slight'.
9. Please clarify whether the well infrastructure at the Wellhead Platform will be prone to corrosion? Will the well infrastructure have corrosion resistant alloy material used to prevent corrosion?
10. Please clarify if the application and discharge dosage of the corrosion inhibitor CRW85440 from Shearwater will be affected by the fluids introduced to the Shearwater process by Jackdaw coming on-line?
11. Please provide an indication of the likely schedule (time of year) for piling the jacket?
12. Please expand on how a magnitude level of 'moderate' for coastal protected areas was arrived at?
13. Reference is made to condensate being heated, please clarify from what source heat is provided, specifically the type of combustion plant required.
14. Contradictory information is included on the use of Low Pressure (LP) flare from Jackdaw. The ES states that gas from the degasser will be sent to the LP flare, but in other places states there will be no incremental LP flaring, please clarify.

OPRED wishes to inform BG International Limited that it will publish a redacted version of this notice at the following GOV.UK webpage:

<https://www.gov.uk/government/publications/jackdaw-field-development>

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 BG International Limited under Regulation 12(3), and BG International 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

[Redacted signature]

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[Redacted name]

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