

Annual Well Intervention and Production Applications: a reminder to Industry

6th September 2024

Annual Well Intervention Application (WIA) chemical permits

The Annual WIA chemical permit is an exercise that OPRED undertakes every year. The **deadline for submission is by Friday 15th November 2024**. Submitting a permit application by the deadline should allow sufficient time for the consultation, review and determination process of the application to be completed by OPRED before 1st January 2025 on the basis of no comments being raised. Should any comments be raised during the review process, Permit Holders are reminded that these should be **addressed promptly**, if the permit is **required** for the 1st January 2025.

Usually, the 'annual' WIA chemical permit timeframe is from January to December. For activities being undertaken on multiple wells during the same calendar year, the permit will always expire on 31st December. However, if the permit does not need to commence on the 1st January of the same calendar year, the permit can be applied for anytime during that calendar year. If the well activities need to continue into a new calendar year, then the Permit Holder should apply for a new permit and must have that permit approved prior to the commencement of the new calendar year.

Information to note

- An annual WIA chemical permit requires a new Chemical Permit SAT to be submitted under a new WIA MAT. The WIA MAT and Environmental Assessment Justification (EAJ) document that forms the basis of the 2024 chemical permit must not be used for the 2025 permit application.
- Each WIA permit application for multiple wells must identify which wells are planned to be worked on and outline what activities will be undertaken on which wells. This information must be captured in the EAJ, and where applicable in the Project Information section in the MAT.
- **The contents of the EAJ should be proportional to the proposed activities and operators should be mindful under which legislation the permit has been submitted.**

Annual review of Production Application (PRA) chemical permits

The Annual PRA exercise is undertaken every year, whereby Permit Holders submit a variation to their PRA to include their proposed chemical use/discharge data for the following year or to review the following year's data should that year already be listed in the SAT. The **deadline for submission is by Friday 15th November**. Submitting a permit application by the deadline should allow sufficient time for the consultation, review and determination process

of the chemical permit variations to be completed by OPRED. Should any comments be raised during the review process, operators are reminded that these should be **addressed promptly**.

A PRA chemical permit variation must include offshore chemical use and/or discharge for the next year of operations (2025), and it is at the Permit Holder's discretion whether to include a forecast for two additional years of chemical use and discharge in the SAT. The Permit Holder must ensure that the use and discharge of chemicals for the next calendar year (2025) have been approved prior to the 1st January of that year.

Information to note

- If approval for chemical use and discharge has not been obtained prior to the 1st January for ongoing activities, then the Permit Holder will be considered as undertaking activities without the chemicals being approved on the permit and therefore may be subject to investigation and enforcement action.
- When submitting the variation to the PRA to include additional years, if there are no changes to chemical use, discharge and associated modelling from the previous year i.e. the 2025 chemical data is an exact copy of the 2024 data, then the variation to add the 2025 data can be submitted in the usual timeframe (approximately three working days before approval is required). In such circumstances the Permit Holder should confirm, in the Change Summary, that there is no change between 2024 and 2025 for chemical use, discharge and associated modelling.
- Should an operator copy and paste the chemical data from the previous year, please ensure that the OCNS registration of all offshore chemical products has not expired. If the OCNS registration of a chemical product has expired, then the operator must remove the chemical product from the 2025 data unless proof of recertification or proof of existing stocks within their ownership can be provided.
- It is expected that the PRA EAJ is also reviewed at this time by the Permit Holder to ensure that the contents is still accurate, and any amendments are made and highlighted accordingly prior to submission to OPRED.
- Please note that the Department will not expedite the approval process for any variations submitted after Friday 15th November 2024 and Permit Holders therefore risk enforcement action if they do not have an approved chemical permit that includes the use and discharge of those chemicals in 2025 by the 1st January 2025. Permit Holders are reminded to be mindful of the national holiday period when planning permit variations.