

From: [REDACTED] (MSS) on behalf of MS PON15
To: BST
Subject: FW: Environmental and Decommissioning Advice
Date: 11 June 2021 14:19:00

Good Afternoon,

Apologies there was an error in my last email. Please see below.

D/4261/2021 – Siccar Point Energy – Cambo Field Development Phase 1 – current deadline 10/7/21, new requested deadline 19/7/21

Best Wishes,

[REDACTED]

From: [REDACTED] (MSS) On Behalf Of MS PON15

Sent: 11 June 2021 13:51

To: 'BST' <bst@beis.gov.uk>

Subject: Environmental and Decommissioning Advice

Dear colleagues.

I am writing to inform you that that MSS will be unable to provide oil and gas environmental and decommissioning advice between the 21st June and 5th July due to staff availability and I ask that this is taken into consideration where possible.

PLEASE NOTE: THIS DOES NOT IMPACT ON THE CONTRACT TO SUPPLY ADVICE ON CHEMICALS. THIS SERVICE WILL REMAIN UNAFFECTED.

As a result of this, I would also like to request extensions to deadlines for the following applications:

[REDACTED]

D/4261/2021 – Siccar Point Energy – Cambo Field Development Phase 1 – current deadline 10/7/21, new requested deadline 12/7/21

I would appreciate it if you could acknowledge this e-mail and confirm that the proposed deadlines are acceptable.

Kind regards

[REDACTED]

CAMBO OIL FIELD

2 Sept: FoES and Uplift have written a pre-action letter to UK Business Secretary Kwasi Kwarteng over the Cambo North Sea oil field – advising of a potential claim for judicial review citing alleged ‘legal errors’. Claiming that the Energy Act (2016) allows the Secretary of State to give directions to the OGA that are “in the public interest”. BEIS said: “As we have previously stated, the Cambo oil field was originally licensed in 2001 and consent for development of the field is a matter for our expert regulators, the Oil and Gas Authority (OGA), and the Offshore Petroleum Regulator for Environment and Decommissioning (OPRED), following their standard regulatory processes.”

1 Sept: OGUK’s 2021 Economic Report calls for more investment in UK offshore industry to build energy security, jobs, and a managed green transition – or rely on other countries for its energy needs. Key findings incl:

- Spend on UK North Sea projects expected to top £20bn over next 5 years - forecast to unlock c2.7bn barrels of oil equivalent (boe) from UK continental shelf (UKCS).
- The UK imported 56% of the gas needed to keep UK homes warm and power stations running between Jan and Mar 2021 – among the highest seen for the same winter quarter. Gas imports rose in 2010, remained high since.
- Gas imports were needed as demand rose last winter while UK production fell partly due to Covid 19 but also because gas output from North Sea is in long-term decline.
- Overall, UK still gets 73% of total energy from gas and oil, with production from the UKCS providing around 70% of this demand.

1 Sept: Greenpeace launched legal challenge against UKG, seeking withdrawal of BP drilling permit for Vorlich field – claiming potential implications for Cambo. The initial licence to drill the oil field was first granted in 1981, but the permit – similar to a lease – was granted in 2018. It is the first ever court challenge to an offshore oil permit. If Greenpeace wins, the ruling from Scotland’s Court of Session is expected to have a significant impact on how future oil permit decisions are made.

Scottish Ministers are unable to comment on ongoing/active legal proceedings.

20 Aug: ‘Future North Sea oil investment risked by SNP-Green deal, warn industry figures’ - Energy Voice.

Jake Molloy, **RMT**: *“From a strictly oil and gas perspective it’s inevitable there’s going to be concerns... It creates that political instability...in terms of attracting investment and that uncertainty could cost jobs. ...On the other side of it, the Greens have repeatedly supported our calls for far greater domestic content and indigenous supply chain opportunities in renewables”.*

Gary Smith, **GMB**, said: *“Workers across our energy sector will be looking on with real concern, ...seeking assurances that this deal will not be a one-way ticket to the dole queue – it’s as simple as that.”*

Mel Evans, **Greenpeace**: *“If the Holyrood government genuinely wants a fair and green transition away from fossil fuels for workers and communities...they should stake out a clear position against more oil and gas extraction...”*

Countries around the world cannot continue to maximise recovery of hydrocarbons if the aims of the Paris Agreement are to be met – it cannot be business as usual.

- As members will be aware, oil & gas and wider energy policy is reserved to the UK Government, and this includes the licensing and exploration of offshore reserves

CAMBO OIL FIELD

- In my letter to the PM I asked the UK Government to commit to significantly enhancing the climate conditionality through offshore production, and that it agrees to reassess licenses already issued but where field development has not yet commenced.
- This week's OGUK report demonstrates that oil and gas continues to play an important role in our domestic energy mix, and in helping to ensure a secure energy supply.
- It is clear that renewable or low carbon jobs cannot replace oil and gas jobs immediately and that is why we are committed to ending our contribution to climate change in a way that is just and leaves no-one behind.

As a demonstration of our commitment to a just transition across Scotland, we will work with partners, communities and other stakeholders to take forward a ten-year £500m Just Transition Fund for the North East and Moray.

- Principles of fairness and opportunity must be a national mission in our journey to a net-zero economy.
- The knowledge and experience of the oil and gas sector and its supply chain will be very important for developing and investing in essential low carbon technologies, such as CCUS – a technology that is seen by experts such as the UK Committee on Climate Change and the International Energy Agency as being vital to achieving Scottish, UK and international climate emissions targets.
- In line with our climate obligations, we will continue to reduce our reliance on fossil fuels as part of Scotland's journey to net zero. Our updated Climate Change Plan sets out transformational policies including a substantial increase in renewables energy capacity, targeting up to 11GW of offshore wind capacity by 2030 – enough to power up to 8 million homes - and setting an ambition, subject to consultation, of between 8 and 12GW of onshore wind by the same date.
- We are also committed to reducing car kilometres by 20% by 2030 whilst investing £5 billion in Scotland's railways over the course of the parliament, and the decarbonisation at least 1 million homes by 2030."

As the recent report from the UN Intergovernmental Panel on Climate Change (IPCC) has made absolutely clear, the climate emergency poses a severe threat and heightened risk to the planet.

- These stark warnings are a powerful reminder that we must do more to deliver – and indeed accelerate – a just transition for this industry, the workforce, and for our communities and people.
- In my letter to the PM, I asked the UK Government to commit to significantly enhancing the climate conditionality through offshore production, and that it agrees to reassess licenses already issued but where field development has not yet commenced.
- The Scottish Government has offered to engage further about what this process should involve to ensure that it is credible and commands confidence.
- We are wholly committed to becoming a net-zero economy by 2045.
- We have made clear that any Scottish Government support for oil and gas businesses operating in the North Sea is conditional upon them contributing to a sustainable and inclusive energy transition, and ensuring a secure energy supply.

CAMBO OIL FIELD

- Many of the key levers needed to support the oil and gas sector are reserved to Westminster. We seek to work closely with the UK Government to ensure both governments are doing all they can to protect jobs and retain vital skills.

SUPPORT FOR O&G TRANSITION

The Scottish Government's £62m Energy Transition Fund (ETF) will support our energy sector and the North East help make significant progress on energy transition as we move toward a net zero society by 2045.

- The ETF will protect existing jobs and create new jobs in the North East, and across Scotland, by opening up opportunities through energy transition and harnessing private sector funding.
- We have already announced £26m for the Energy Transition Zone, £16.6m funding for NZTTP, £6.5m for a Global Underwater Hub, and £4.65m to the Aberdeen Hydrogen Hub.
- The investment will benefit the wider Scottish energy sector and broader supply chain, working with local businesses to maximise the economic benefits, create and support sustainable jobs and contribute to inclusive economic growth.

CONTINUED KEY ROLE FOR SECTOR

The sector continues to play an important role in our energy mix, in helping to ensure a secure energy supply.

- Production from the North Sea is a highly-regulated industry, with some of the most advanced and comparatively least polluting production methods.
- Maintaining domestic oil and gas production can lead to lower net global emissions than under a scenario where Scotland depends more on imports.
- This is due to a number of possible imported crude oil sources having a higher carbon-intensity than Scottish production.
- The oil and gas supply chain is a significant part of the energy transition supply chain, it is clear that renewable or low carbon jobs cannot replace oil and gas jobs immediately and a managed transition is needed.
- The knowledge and experience of the oil and gas sector and its supply chain will be very important for developing and investing in essential low carbon technologies, such as CCUS – a technology that is seen by experts such as the UK Committee on Climate Change and the International Energy Agency as being vital to achieving Scottish, UK and international climate emissions targets.

The oil and gas sector can play a positive role in Scotland's energy transition.

- The sector continues to play an important role in our energy mix, in helping to ensure a secure energy supply.
- It also provides feedstock to support the petrochemical and fertilizer industries; and raw materials for plastic industrial chemical and pharmaceutical industries.
- The sector will help to design the diverse energy system we need for the future.
- This includes options such as hydrogen production and developing floating wind and marine energy, with many businesses already diversifying into these areas.
- The knowledge of the sector and its supply chain is important to developing key low carbon technologies such as Carbon Capture Utilisation and Storage (CCS).
- CCS technology is seen by experts such as the UK Committee on Climate Change and the International Energy Agency as being vital to achieving Scottish, UK and international climate emissions targets.

From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED] ([MARLAB](#))
Subject: Cambo oil field environmental statement - copy of MSS comments.
Date: 12 August 2021 11:55:00

Hi [REDACTED],

I hope that you are well.

Since there is a bit of media attention around the Cambo oil field at the moment, I just wanted to flag to you that the Environmental Impact Assessment for field development was recently reviewed by our group and we have submitted a response to the consultation has been sent on to BEIS.

A copy of the response that [REDACTED] (cc'd) put together is here:

[D/4240/2019 - SICCAR - Cambo Environmental Statement - Marine Scotland Comments \(A26499557\)](#)

There have been a few further emails/correspondence which we can share if of use/interest.

Best wishes,

[REDACTED]

-----Original Message-----

From: [REDACTED]
Sent: 27 August 2021 11:27
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: The Cambo Oil Field Expansion

One for your team I think.

[REDACTED]
EU Strategic Coordination Team Leader | Strategic Coordination Unit Directorate for
Energy and Climate Change| Scottish Government

-----Original Message-----

From: [REDACTED]
Sent: 27 August 2021 11:26
To: [REDACTED]
Subject: FW: The Cambo Oil Field Expansion

Hi [REDACTED]

You have been allocated case ref [REDACTED]. I am e-mailing to let you know that this follow up e-mail from [REDACTED] has been added to the attachements.

Kind regards

[REDACTED]
[REDACTED]
Public Engagement Unit
1E.10 St Andrew's House
[REDACTED]

-----Original Message-----

From: [REDACTED]
Sent: 25 August 2021 08:37
To: [REDACTED]
Subject: FW: The Cambo Oil Field Expansion

From: [REDACTED]
Sent: Wednesday, 25 August 2021 08:36:36 (UTC+00:00) Dublin, Edinburgh,
Lisbon, London
To: [REDACTED]
Subject: The Cambo Oil Field Expansion

From: [REDACTED]
Subject: The Cambo Oil Field Expansion

Message Body:
Dear [REDACTED]

This is a follow up email to one I have just sent you on the above subject. I wanted to share with you a letter I have written to Kwasi Kwarteng for which I am hoping to get your support. In your, no doubt, large post bag it would be surprising if you were able to connect two emails but you never know. Copy letter to Mr Kwarteng.

Mr Kwasi Kwarteng MP,

When your family, in the future, ask you what you did, from the position of great authority with which you were trusted, to mitigate the worst effects of the Climate Crisis in which we are, what will you say.

Consider these two options.

First. I allowed, despite the best scientific advice, an extension of an oil field in the North Sea to be developed thereby allowing huge amounts of additional Carbon to be pumped into the atmosphere directly worsening all the self induced appalling climate issues the world now faces. That you, my family, face. That was me that did that. I take responsibility,

Second. I stood up to the lobby groups and the money and I stopped further extraction of oil in the North Sea and elsewhere because I knew that, for humanity to live comfortably on our own planet, we HAD to reduce, not increase, the amount of Carbon in the atmosphere. I recognised that the house was on fire and that to throw more fuel on the fire would more quickly destroy the house. I stopped that further oil extraction. I took action to protect you, my family. That was me that did that. I take responsibility,

Please make the right choice. For the avoidance of doubt, if you have children or grandchildren (and if not then talk to mine) you will need to explain to them why you made things worse or how you made things better.

What will be your legacy Mr Kwarteng?

Urgently

[REDACTED]

Concerned Human watching the fire take hold in the house in which I live. Thinking about my family who have nowhere else to live. Knowing what I would do if I'd been trusted with your position.

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This e-mail was sent from a contact form on the First Minister of Scotlands website (https://u22000927.ct.sendgrid.net/ls/click?upn=QcVL0aOTD3q2puySJJu1WsEaTq9OtYwWXO61V3gZXOtk1t6c0ySeStthFBVu3jbB5fOg_IdEEahiVlaNtrR8ahWJMqNak)

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From: [REDACTED] on behalf of [MS PON15](#)
To: [REDACTED]
Subject: RE: Cambo Phase 1 Field Development Environmental Statement - D/4161/2021
Date: 03 June 2021 10:46:00

Good Morning,
MSS have requested an electronic copy for this environmental statement.
Kind Regards,

[REDACTED]

Renewable Energy Environmental Advice Group
marinescotlandscience
Scottish Government
Marine Laboratory | 375 Victoria Road | Aberdeen, AB11 9DB
Phone: [REDACTED]
[REDACTED]@gov.scot

From: [REDACTED] <[REDACTED]@SiccarPointEnergy.co.uk>
Sent: 02 June 2021 18:13
To: MS PON15 <MS.PON15@gov.scot>
Cc: [REDACTED] <[REDACTED]@siccarpointenergy.co.uk>
Subject: Cambo Phase 1 Field Development Environmental Statement - D/4161/2021

Good afternoon,
Siccar Point Energy E&P Limited has submitted a letter of application to the Oil and Gas Authority in relation to the proposed Cambo Field Development. The application is supported by an Environmental Statement which has been submitted to BEIS OPRED under the Offshore Oil and Gas Exploration, Production, Unloading and Storage (Environmental Impact Assessment) Regulations 2020.

An acknowledgement has been received from BEIS OPRED and SPE is required to serve you with a copy of the Regulation 11(1) Notice, a copy of the ES and a copy of the summary of the project. Before the necessary arrangements are made please can you confirm your preferred format for transmission of the information i.e. hard copy of the ES and/or electronic copy? Due to the size of the file, electronic copies will be delivered via a secure file transfer process rather than as attachment to an e-mail.

SPE is planning to go to public notice early next week (i.e. week beginning 7th June).

I look forward to hearing from.

Kind regards,

[REDACTED]

HSE Advisor
Siccar Point Energy Limited
3rd Floor, H1
Hill of Rubislaw
Anderson Drive
Aberdeen, AB15 6BY
Direct: [REDACTED]
Switch: 01224 678008
Mobile: [REDACTED]

www.siccarpointenergy.co.uk

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From: [REDACTED] on behalf of [MS PON15](#)
To: [REDACTED]
Subject: FW: Cambo Phase 1 Field Development Environmental Statement - D/4161/2021
Date: 03 June 2021 09:02:00

Hi [REDACTED],
Please see below in relation to the proposed Cambo Field Development.
Thanks,

[REDACTED]
Offshore Environmental and Chemical Coordinator

Scottish Government

Marine Laboratory | 375 Victoria Road | Aberdeen, AB11 9DB

Phone: [REDACTED]

[REDACTED] [@gov.scot](#)

From: [REDACTED] [@SiccarPointEnergy.co.uk](mailto:[REDACTED]@SiccarPointEnergy.co.uk)>

Sent: 02 June 2021 18:13

To: MS PON15 <MS.PON15@gov.scot>

Cc: [REDACTED] [@siccarpointenergy.co.uk](mailto:[REDACTED]@siccarpointenergy.co.uk)>

Subject: Cambo Phase 1 Field Development Environmental Statement - D/4161/2021

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I look forward to hearing from.

Kind regards,

[REDACTED]
HSE Advisor
Siccar Point Energy Limited

3rd Floor, H1
Hill of Rubislaw
Anderson Drive

Aberdeen, AB15 6BY

Direct: [REDACTED]

Switch: 01224 678008

Mobile: [REDACTED]

www.siccarpointenergy.co.uk

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www.siccarpointenergy.co.uk.

From: [REDACTED] on behalf of [MS PON15](#)
To: [REDACTED]
Subject: FW: Cambo Phase 1 Field Development Environmental Statement - D/4161/2021
Date: 03 June 2021 09:02:00

Hi [REDACTED],
Please see below in relation to the proposed Cambo Field Development.
Thanks,

[REDACTED]
Offshore Environmental and Chemical Coordinator

Scottish Government

Marine Laboratory | 375 Victoria Road | Aberdeen, AB11 9DB

Phone: [REDACTED]

[REDACTED] [@gov.scot](#)

From: [REDACTED] [@SiccarPointEnergy.co.uk](mailto:[REDACTED]@SiccarPointEnergy.co.uk)>

Sent: 02 June 2021 18:13

To: MS PON15 <MS.PON15@gov.scot>

Cc: [REDACTED] [@siccarpointenergy.co.uk](mailto:[REDACTED]@siccarpointenergy.co.uk)>

Subject: Cambo Phase 1 Field Development Environmental Statement - D/4161/2021

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An acknowledgement has been received from BEIS OPRED and SPE is required to serve you with a copy of the Regulation 11(1) Notice, a copy of the ES and a copy of the summary of the project. Before the necessary arrangements are made please can you confirm your preferred format for transmission of the information i.e. hard copy of the ES and/or electronic copy? Due to the size of the file, electronic copies will be delivered via a secure file transfer process rather than as attachment to an e-mail.

SPE is planning to go to public notice early next week (i.e. week beginning 7th June).

I look forward to hearing from.

Kind regards,

[REDACTED]
HSE Advisor
Siccar Point Energy Limited

3rd Floor, H1
Hill of Rubislaw
Anderson Drive

Aberdeen, AB15 6BY

Direct: [REDACTED]

Switch: 01224 678008

Mobile: [REDACTED]

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www.siccarpointenergy.co.uk.

From: [REDACTED] on behalf of [MS PON15](#)
To: [REDACTED]
Subject: FW: Cambo Phase 1 Field Development Environmental Statement - D/4261/2021
Date: 04 June 2021 16:49:00
Attachments: [Marine Scotland Science Cover Letter Cambo ES D-4261-2021.pdf](#)
[Cambo ES D-4261-2021 Notice Under Regulation 11\(1\).pdf](#)
[Cambo Field Development \(D-4261-2021\) Summary of the Project.pdf](#)

Hi [REDACTED],

Please see below from Siccar Point Energy.

Siccar Point Energy - Cambo Phase 1 Field Development Environmental Statement - D/4261/2021 - Marine Scotland Science Cover Letter

<https://erdm.scotland.gov.uk:8443/documents/A33545236/details>

Siccar Point Energy - Cambo Phase 1 Field Development Environmental Statement - D/4261/2021 - Regulation 11

<https://erdm.scotland.gov.uk:8443/documents/A33545234/details>

Siccar Point Energy - Cambo Phase 1 Field Development Environmental Statement - D/4261/2021 - Summary of Project

<https://erdm.scotland.gov.uk:8443/documents/A33545235/details>

Best Wishes,

[REDACTED]

Offshore Environmental and Chemical Coordinator

Scottish Government

Marine Laboratory | 375 Victoria Road | Aberdeen, AB11 9DB

Phone: [REDACTED]
[REDACTED]

From: [REDACTED]@SiccarPointEnergy.co.uk>

Sent: 04 June 2021 16:04

To: MS PON15 <MS.PON15@gov.scot>

Cc: [REDACTED]@siccarpointenergy.co.uk>

Subject: Cambo Phase 1 Field Development Environmental Statement - D/4261/2021

Good afternoon,

Under Regulation 11(3)(a) of the Offshore Oil and Gas Exploration, Production, Unloading and Storage (Environmental Impact Assessment) Regulations 2020, Siccar Point Energy E&P Limited (SPE) has been requested by BEIS OPRED to provide Marine Scotland Science with a copy of the Cambo Field Development Environmental Statement (ES Ref: D/4261/2021) and supporting information. The ES will be delivered to you in due course via a secure file transfer process, from our consultants at Fugro.

Please find attached a cover letter detailing the fact that SPE has submitted an application for consent to the Oil and Gas Authority in relation to the proposed Cambo Field Development. Also attached is a copy of the Regulation 11(1) Notice and a copy of the Summary of the Project notification letter submitted to OPRED.

If you can acknowledge receipt of the ES once downloaded this would be much appreciated.

Many thanks.

Kind regards,

[REDACTED]

HSE Advisor
Siccar Point Energy Limited
3rd Floor, H1
Hill of Rubislaw

Anderson Drive
Aberdeen, AB15 6BY
Direct: [REDACTED]
Switch: 01224 678008
Mobile: [REDACTED]

www.siccarpointenergy.co.uk

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From: [REDACTED] (MARLAB)
To: [REDACTED]
Subject: Cambo
Date: 16 August 2021 09:18:33

Just for your info [REDACTED]

We had three DRA applications in for Cambo this month which were just to install the CANductors on three wells. No drilling on the wells as yet, just installing the CAductors but we didn't have any significant concerns.

[REDACTED]

Please contact by email. Currently working from home until further notice

[REDACTED] B.Tech, PIEMA | Offshore Energy Environmental Advice (OEAA) Marine
Environmental Advisor | Marine Scotland |

Scottish Government | Marine Laboratory, 375 Victoria Road, Aberdeen, AB11 9DB

T: [REDACTED]
S/B: +44 (0)131 244 2500
www.gov.scot/marinescotland





MS.PON15@gov.scot

EMT
BEIS
Aberdeen

MARINE SCOTLAND SCIENCE RESPONSE

Siccar Point Energy E&P Limited - Cambo Field Development - (D/4240/2019) – Additional information

Marine Scotland welcome the additional information document provided.

Marine Scotland have reviewed the information and have no further comments on the points taken forward by the Department or the associated responses.

Marine Scotland refer the Department to the original Marine Scotland response for all other comments.

The assessment of this application was conducted by  Any correspondence should be sent by email to MS.PON15@gov.scot.

Regards



Offshore Environmental and Chemical Coordinator
1 July 2020


MS.Chemicals@gov.scot

16 July 2020

MARINE SCOTLAND SCIENCE RESPONSE

Siccar Point Energy E&P Limited - Cambo Field Development - (D/4240/2019) – Additional information (as amended)

Marine Scotland welcome the additional information document provided.

Marine Scotland have reviewed the information and have no further comments on the points taken forward by the Department or the associated responses.

Marine Scotland refer the Department to the original Marine Scotland response for all other comments.

The assessment of this application was conducted by Dan Stewart. Any correspondence should be sent to MS.Chemicals@gov.scot

Regards


Offshore Environmental and Chemical Coordinator

From: [REDACTED] on behalf of [MS Chemicals](#)
To: [REDACTED]
Cc: ["BST"](#)
Subject: D/4240/2019 - SICCAR - Cambo Environmental Statement - Additional Information - MSS Response 01/07
Date: 01 July 2020 15:19:00
Attachments: [D_4240_2019 - SICCAR - Cambo Environmental Statement - Additional Information - MSS Response 01_07.doc](#)

Good Afternoon,

Please see attached MSS response to the Cambo Environmental Statement additional information.

Kind regards,

[REDACTED]
Offshore Environmental and Chemical Coordinator
Marine Scotland - Science

Scottish Government | Marine Laboratory |
375 Victoria Road | Aberdeen | AB11 9DB

Tel: [REDACTED]
S/B: +44 (0) 131 244 2500


MS.Chemicals@gov.scot

16 July 2020

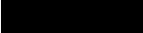
MARINE SCOTLAND SCIENCE RESPONSE

Siccar Point Energy E&P Limited - Cambo Field Development - (D/4240/2019) – Additional information (as amended)

Marine Scotland welcome the additional information document provided.

Marine Scotland have reviewed the information and have no further comments on the points taken forward by the Department or the associated responses.

Marine Scotland refer the Department to the original Marine Scotland response for all other comments.

The assessment of this application was conducted by . Any correspondence should be sent to MS.Chemicals@gov.scot

Regards


Offshore Environmental and Chemical Coordinator

From: [REDACTED] (Energy Development & Resilience)
To: MS.PON15
Cc: BST
Subject: RE: Siccar Point Energy - Cambo Phase 1 Field Development Environmental Statement - D-4240-2019 -
Date: Monday, 29 June 2020 09 03:41
Attachments: [image002.png](#)
[image003.png](#)

Morning [REDACTED]

[REDACTED]

Regarding your e-mail below and the additional information from SPE. As you may (or may not!) be aware we are reviewing our EIA practices to ensure we meet the requirements of the EIA regs. As part of this we need to ensure we are making any significant additional information provided by an operator in relation to an ES available for further public participation and also ensuring the original consultees have sight of this information. There is no direct requirement for consultees to review and comment but the opportunity is there to do so if you wish. If Marine Scotland have no further comments then a simple nil response would suffice.

If there is anything you would like to discuss feel free to give me a call on the number below or alternatively I can set up an MS teams meeting for us. I know SG doesn't have MS Teams but I understand you can participate if you are invited.

Best regards|



[REDACTED]
Environmental Manager

Offshore Petroleum Regulator for Environment and Decommissioning
Department for Business, Energy and Industrial Strategy
AB1 Building, Crimon Place, Aberdeen. AB10 1BJ
T: 01224 254173
E: [REDACTED] [@beis.gov.uk](mailto:[REDACTED]@beis.gov.uk)
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From: BST <bst@beis.gov.uk>
Sent: 26 June 2020 09:14
To: [REDACTED] (Energy Development & Resilience) [REDACTED] [@beis.gov.uk](mailto:[REDACTED]@beis.gov.uk)>
Subject: FW: Siccar Point Energy - Cambo Phase 1 Field Development Environmental Statement - D-4240-2019 -

Good Morning [REDACTED],

Please see MS comment below.

Kind Regards

cid:image001.png@01D27AFB.3D00AC80



Business Support Team

Offshore Petroleum Regulator for Environment and Decommissioning
Department for Business, Energy and Industrial Strategy
3rd Floor, AB1 Building (Wing C), Crimon Place, Aberdeen. AB10 1BJ
T: 01224 254138
E: bst@beis.gov.uk
[Follow us on Twitter @beisgov.uk](#)

From: [REDACTED] [@gov.scot](mailto:[REDACTED]@gov.scot) <[\[REDACTED\]@gov.scot](mailto:[REDACTED]@gov.scot)> On Behalf Of MS.PON15@gov.scot
Sent: 26 June 2020 08:54
To: BST <bst@beis.gov.uk>
Subject: Siccar Point Energy - Cambo Phase 1 Field Development Environmental Statement - D-4240-2019 -

Dear EMT,

Marine Scotland have received additional information directly from the operator -Siccar Point Energy in association with the Cambo Phase 1 Field Development Environmental Statement (D-4240-2019).

Could you please advise if you require a response from Marine Scotland and whether this should be forward to the Department in

the usual manner.

Kind Regards

██████████

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MS.PON15@gov.scot

OPRED EMT
BEIS
Aberdeen

4 December 2019

D/4240/2019 – Siccar Point Energy E&P Limited - Cambo Field Development – Environmental Statement

Application summary

This Environmental Statement (ES) presents the results of the Environmental Impact Assessment (EIA) conducted to evaluate the environmental impacts of the proposed Cambo Field Development located in quadrants 204 (Cambo field) and 205 (gas export pipeline route to the West of Shetland Pipeline System (WOSPS)), which comprises:

- The installation and commissioning of a custom designed, new build, Sevan-type, Floating Production Storage and Offload (FPSO) vessel;
- The batch drilling, commissioning and operation of up to thirteen sub-sea wells (nine production wells from two drill centres and four water injection wells), targeting the Cambo reservoir using a semi-submersible drilling rig.;
- The installation, of,
 - A 69.9 km long 10" gas export pipeline, tying into the WOSPS. 30 km of the pipeline from WOSPS to 600 m depth is to be trenched and buried using jet trenching techniques and the remaining 39.9 km is to be surface laid;
 - Three gravity based / suction piled manifold structures (one production manifold at each drill centre and a water injection manifold);
 - A gravity based / suction piled Water Injection and Controls Distribution Structure (WICDS);
 - A gravity based / suction piled Pipeline End Termination Structure (PLET);
 - A gravity based / suction piled Sub-Sea Isolation Valve (SSIV);
 - A piled Cambo Tie-in structure (CTIS) at the WOSPS location;
 - Associated in-field flowlines, umbilicals, and jumpers, some of which will be up to 3.73 km in length.
- The worst case use of protective materials (20,000 tonnes of rock and 36 concrete mattresses);
- Production of hydrocarbons (crude oil and gas) via the new FPSO (crude oil to be exported by tanker) and gas to be exported via the WOSPS gas pipeline. The field has a projected 25 year life, with first oil anticipated in 2023.
- The discharge of produced water with an oil content of 15 mg/l or less measured on a monthly average basis.

Response summary

The ES for this development is considered to be of a good standard and appropriate for the nature of this development. The document is well thought out and uses a logical process to identify potential impacts and describes appropriate mitigation. The assessment addresses Marine Scotland's (MS) areas of interest well and is aligned with the policies and Objectives of Scotland's National Marine Plan.

MS would advise that the ES is acceptable for a project of this nature but would advise that the Department seek further clarification over;

- The justification for surface laying of the pipeline below 600 m water depth, given that fishing activity may take place down to 800 m (along the deepwater ridge) and trawl marks have been observed at depths of 600 m. The construction design / material of the pipeline is not clear. Is the 20 km exposed section along the shelf slope designed to tackle a 'hit' as the Scottish Fishermen's Federation (SFF) raise? Marine Scotland's preference would be for a fully trenched and buried pipeline where technically

feasible, but it is highlighted that trenching and burial of the pipeline out to 50 km from the CTIS would ensure the pipeline is buried along the continental slope where the majority of fishing activity is observed. It is highlighted to the Department that fishing patterns may also change within the 25 year life of the development, particularly as species move into deeper, colder waters as highlighted in section 4.3.3.

- Whether wells will be 'fishing friendly', 'overtrawlable' or neither as conflicting information is presented;
- Whether the additional mitigation being considered for commercial fisheries and the long polyester rope anchor lines (such as sonar deflectors) should be taken forward to the commitments register. MS would regard this as useful mitigation;
- Whether the pipeline and associated infrastructure and protective material could be removed at the time of decommissioning. The application states that the intention is to 'leave the area in the condition that it will pose no harm to the marine environment'. It is, however, highlighted that a key principal of current UK policy is to leave a 'clear sea bed'.
- Whether a Health and Safety Executive granted 'Offshore Development Area' would be appropriate for this development during the construction phase.

Overall, the mitigation proposed appears proportionate and appropriate to minimise potential impacts of the project.

Section comments

Option selection and project description

The ES acknowledges that this project includes a section of pipeline (~25 km long), routed through a Nature Conservation Marine Protected Area (NCMPA) (The Faroe Shetland Sponge Belt) but fully describes alternative options and using high quality site survey information, accurately demonstrates the limited potential for impact on the NCMPA. It is unfortunate that infrastructure sharing opportunities with other potential or existing developments are not considered feasible and is advised that the Department satisfy themselves in this regard. It is also noted that the only feasible oil export route (due to cost effectiveness and flow assurance issues) is to tanker oil from the development, which is likely to carry an inherently higher risk of an accidental event, particularly given the environmental conditions experienced at this exposed location. In the event that offloading is disrupted by weather, will production be curtailed / shut in? On balance, MS consider the option of an FPSO and the proposed gas export route with the stated mitigation an appropriate option.

It appears from the description that the pipeline will first be laid then jet trenched (for the 30 km section). As the exposed pipeline on the seabed may pose a hazard to commercial fishing operations during laying, it is advised that due consideration is given to timing of this operation to avoid the peak fishing season and that mitigation, such as the use of guard vessels, is considered in discussion with the SFF. An appropriate reference in support of the likely sediment plume from jet trenching activities is advised in section 7.1.3.

MS welcome that CAN-Ductors are proposed where technically feasible, and that these will limit the volumes of discharged water based mud and cuttings and associated cement deposits. MS welcome that the pumping of cement will cease when cement returns are observed by ROV at the seabed, but it is questioned how this will be managed during periods of inclement weather / poor visibility. It is advised this is addressed at the appropriate permitting stage.

The specific grid reference locations of the WICDS, PLET and SSIV are not detailed in the document, however Figure 3.8 appears to show these structures sitting outside the Cambo FPSO safety zone. MS would like to understand whether the operator has explored the possibility of positioning these structures with the proposed 500 m safety zone or extending the safety zone to provide additional protection to these structures.

MS notes that the produced water (PW) management option chosen for the development is overboard discharge with an oil content of 15 mg/l or less measured on a monthly average basis. It is highlighted that the base case for any new developments in line with OSPAR 2001/1 should zero discharge of oil in PW, however, it is acknowledged that issues with reservoir souring and weak rock formations are provided in this case as justification for overboard discharge. It is advised the Department satisfy themselves with the technical justification provided and that all alternative options have been explored. Marine Scotland welcomes that all discharges will be maintained within regulatory limits and that the Risk Based Approach (RBA) threshold for PW is likely to be met.

It is noted that section 10 (Produced water discharges) does not discuss what the density or salinity of the PW is. There is mention of temperature (and density) in the discharge characteristics section (10.3.2) but no value for density. Given that a high saline value would have an impact on the dispersion of the PW plume in the

water column it would be useful to have had its value. A denser PW would be more likely to sink in the water column and possibly reach the seabed, although given the water depth at Cambo this would be highly unlikely. Clarification on the density and salinity of the PW would be beneficial. The design parameters of the FPSO PW treatment system (as shown in section 3.7.3) appear to be for 12,719 m³/day, however the application refers to the annualised maximum anticipated rates of PW generated are 802,910 m³ / day. Could this please be clarified?

The full assessment of the chemicals to be used in the well completion, future drilling and any pipeline commissioning is, correctly, deferred until the production of the relevant permit submissions. However, a high level overview of the proposed chemical use is provided.

The application discusses the use of subsea templates and manifolds interchangeably, and it would be useful to have some clarity over what is proposed. It is assumed that subsea manifolds with close clustered wells has been chosen as opposed to drilling templates where wells are drilled through the template.

The non-technical summary is well written for the non-technical reader and is logically presented.

Environmental Description

The environmental section is of a good standard and is supported by up-to-date (2019), good quality, intelligently designed, site survey information and use of other historical site specific surveys and regional site surveys. A summary is provided of the survey methods used and design of the surveys, which is welcomed, with the location of environmental sampling stations clearly shown on a map. Good use has been made of images and figures throughout the document.

Significant parts of the physical environment are, as would be expected, described on the basis of generic data. Marine Scotland are satisfied that the plankton, benthos and fish spawning / nursery information sections are adequately constructed with good use of photographs and figures and information from the Marine Scotland National Marine Plan interactive.

The commercial fisheries section is well constructed and makes good use of figures, however, tabulated data in addition to the Figures are advised for clarity. 'Within year' seasonality of fishing effort (by month) is also advised as this may highlight additional mitigation opportunities, particularly with regards to timing of pipelaying operations in shallower waters.

Other sea users and oil and gas infrastructure are identified and information in these sections is well presented.

Conservation areas both offshore and onshore appear to be correctly identified with a useful description provided of the conservation interest in each area. Some errors are present regarding the distances to protected areas which is highlighted below.

Environmental Impact Assessment Process

Marine Scotland agree with the list of potential impacts and pathways identified in this ES and the assessment process is defined, logical and well presented. Marine Scotland welcome the level of consultation that has been held regarding this project and that an ENVID workshop has been conducted. Appendix 4 summarises issues raised by stakeholders which is very useful and details how any concerns have been addressed.

The physical presence, atmospheric emissions, discharges to sea, and accidental events sections are considered to be appropriately constructed. Marine Scotland welcome the engagement that the operator has had with the SFF and the site specific fishing intensity study conducted in 2019.

Marine Scotland welcome that an approved Offshore Pollution Emergency Plan (OPEP) / Temporary Operations Oil Pollution Emergency Plan (TOOPEP) will be in place prior to any development commencing.

The potential cumulative and transboundary impacts are identified in each section which is deemed adequate for the purposes of this ES.

General comments

Section 3.6.1 (Trees, Jumpers and Manifolds) – Table 3.7 – Should the total not equal 422.7?

Section 4.2.5. (Seabed sediments) – Is there an explanation for the higher concentrations of copper, chromium and zinc observed?

Section 4.3.3. (Fish and shellfish) – It is highlighted that ICES 49E6 is also recognised as a low intensity cod spawning area by Ellis *et al*, 2012.

Section 4.3.4. (Marine mammals) – contains an error message.

Section 4.5.2. (Offshore conservation areas) – Could the proximity of the Faroe Shetland Sponge Belt please be checked as this appears to be more like 16 km from the proposed development using the coordinates provided? Likewise, the proposed pipeline route appears to be located only 55 km from the West Shetland Shelf MPA and some 63 km from the North-West Orkney MPA. Distances from the development to all SAC's described and the Seas Off Foula pSPA also appear to be incorrect.

Section 4.6.1. (Other Users of the Sea) - It is advised that references to the work by 'Kafas *et al*, 2012' are now replaced with new aggregated VMS fishing effort data sets for 2009 - 2016 available on the National Marine Plan Maps interactive web site (NMPi). The data are split into three groups of fishing method: bottom trawls, dredges and crustaceans caught by bottom trawl (i.e. *Nephrops*). The *Nephrops* and crustaceans layer is a subset of the dredges layer but also includes data for 2017. Further information may be obtained here <http://marine.gov.scot/node/12832>. This information would benefit from being shown visually.

In addition, Marine Scotland has recently added nine new spatial layers to the National Marine Plan interactive (NMPi) showing changes over the last five years of published statistics for:

1. tonnage for demersal, pelagic and shellfish species;
2. value (£) for demersal, pelagic and shellfish species;
3. effort (days) (by UK vessels >10m length) for demersal active (bottom trawls, dredges etc.); pelagic active (pelagic trawls, purse seines etc.); and passive (pots/creels, gillnets etc.).

Further details are available here: <http://marine.gov.scot/node/12674>

All the above spatial layers may be viewed on the Marine Scotland MAPS National Marine Plan interactive (NMPi) web site (link below) and it is recommended these are represented visually:

<https://www2.gov.scot/Topics/marine/seamanagement/nmpihome>

Final fisheries statistics for 2018 were published in September 2019 and should be used for future applications. These are available from the web link below:

<https://www2.gov.scot/Topics/Statistics/Browse/Agriculture-Fisheries/RectangleData>

MS calculate the total effort from all three gear types in the study area to be 5,169 days not 4,940 days.

MS calculate the demersal sales value of rectangles 51E6, 50E5, 50E6, 49E4, 49E5 and 49E6 to the UK fishing industry between 2012 and 2016 to be £67,497,795 not £67,877,016.

The title of Figure 4.35 would benefit from clarifying that this represents the total values.

Section 4.6.2. (Aquaculture) – It is highlighted that the following reports are now available:

- The Scottish Shellfish Farm Production survey 2018 (<https://www2.gov.scot/Topics/marine/Fish-Shellfish/FHI/surveys>) (These statistics are usually published in May each year);
- The Scottish Finfish Farm Production survey 2018 (<https://www2.gov.scot/Topics/marine/Fish-Shellfish/FHI/surveys>) (These statistics are usually published in September each year).

It is highlighted that 6,647 tonnes of mussels were produced in Shetland in 2017 representing 81% of the total Scottish production.

Section 6.3. (Assessment of effects and their significance) – Citations included in this section are not listed in the references section.

Section 7.1.2. (Infield infrastructure and associated risers, umbilicals and flowlines) – Table 7.3. – Should the Total effected area for the injection flowlines not equal 3340 m²?

Section 7.1.3. (Potential effects on seabed communities) – It is not clear what is meant by “The installation of the proposed development infrastructure on the seabed will result in a reduction in the total extent of the original seabed habitat (take) over an area of up to 17,434.6 m² (0.017 km²)”.

It would be useful for the section to define what is meant by ‘siltation changes ‘light’. FEAST provides a definition of this.

Section 7.3. (Mitigation measures) – Will the mooring lines of the FPSO be specifically marked on Kingfisher / Fish safe?

Section 8.1.2. (Wider scale impacts) - It is advised that emissions from the operation are compared to UK emissions as detailed in the 2019 Oil and Gas UK environment report available here:

<https://oilandgasuk.co.uk/product/environment-report/>

Section 9.2.1. (Physical extent of discharges) – The section highlights differences between the cuttings generated from this operation and the SERPENT study at the Rosebank location, but it not clear how these differ.

The section would also benefit from detailing what volumes of cement were discharged in association with the Cambo 4 well, where cement deposition was observed within 50 m of the well.

Section 11.1.5. (Underwater sound from piling during installation of the Cambo tie-in structure) – A citation for ‘Betke (2008)’ is not listed in the references section.

Section 11.1.6. (Underwater sound generated by the FPSO) A citation for ‘Erbe *et al*, (2013)’ is not listed in the references section.

Section 13.2 (Likelihood of a hydrocarbon spill from the MODU) – The section states that the Cambo wells carry a 5.6% to 9.2% chance of a spill per well. This appears to be high and should be checked.

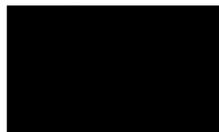
Section 13.4.3 (Oil spill modelling) – Figures 13.6 and 13.7 should be labelled with a value for the thickness of surface oiling in µm.

Survey requests

Marine Scotland would like to request a copy of the following surveys / reports cited in this submission for our archive. Please note that survey reports held by Marine Scotland may be made publicly available and published on the Marine Scotland website:

- MMT, 2019. *Cambo Field development survey. Geophysical, benthic and geotechnical site and route survey. August-September 2018*. Report to Siccar Point Energy.
- Xodus, 2019. *Cambo fishing intensity study (Phase I)*. Report No: L-100528-S00-REPT-001. Rev 02, 9 January 2019.

Please do not hesitate to contact MS.PON15@gov.scot should anything in this response be unclear.



Marine Environmental Advisor / Offshore Energy Environmental Advice
Marine Scotland - Science

3/12/19

From: [REDACTED] on behalf of [MS PON15](#)
To: ["BST"](#)
Subject: D-4261-2021 - Cambo ES (1) - Siccar Point Energy - Marine Scotland Comments
Date: 16 July 2021 13:19:00
Attachments: [D-4261-2021-Cambo ES \(1\) - Siccar Point Energy - Marine Scotland Comments.docx](#)

Good Afternoon,

Please find attached MSS comments for the Cambo ES.

Kind Regards,

[REDACTED]