

From: [REDACTED] (MARLAB)
To: [REDACTED] (Energy Development & Resilience)"
Subject: RE: AGR - Cambo CP/1520
Date: 08 June 2018 09:32:00
Attachments: [image003.jpg](#)
[image005.png](#)

Hi [REDACTED],

I think you're right it does seem like maybe the HW540 E hydraulic fluid will be ultimately discharged topside with the brine and not the normal subsea actuation release so just ignore that comment on the response.

Thanks,

[REDACTED]

Offshore Chemicals Assessor
Marine Scotland Science
Scottish Government | Marine Laboratory, PO Box 101| 375, Victoria Road | Aberdeen AB11 9DB

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

From: [REDACTED] (Energy Development & Resilience) [REDACTED]@beis.gov.uk]
Sent: 08 June 2018 09:26
To: [REDACTED] (MARLAB)
Subject: AGR - Cambo CP/1520

Morning [REDACTED],

Many thanks for prioritising this one and thanks for your comments. I will include the comment related to tracers – good point. Regarding the HW 540 E I think that on review the batch code may be correct. They plan to discharge the HW 540 E into the riser that contains brine and at the end of operations will discharge the brine and HW 540 E as a batch, rather than subsea discharge of control fluids that we normally see:



Does that make sense or am I reading it wrong?

Thanks,

[REDACTED]



[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 [REDACTED]
E: [REDACTED]@beis.gov.uk

From: [REDACTED] (Energy Development & Resilience)
To: MS.PON15
Subject: 2018-06-14 - AGR Cambio - DRA/533 - CP/1520 - Operator response to comments - FAO [REDACTED]
Date: 14 June 2018 10:32:06
Attachments: [image007.jpg](#)
[image008.jpg](#)
[image009.png](#)

Hi [REDACTED],

Please see below for comments included within the above permit last variation and also AGR update in response. I am content with their response and attached to enable update of your comment tracker, although if you have any further comments I'd be happy to receive them.

Happy to discuss if required.

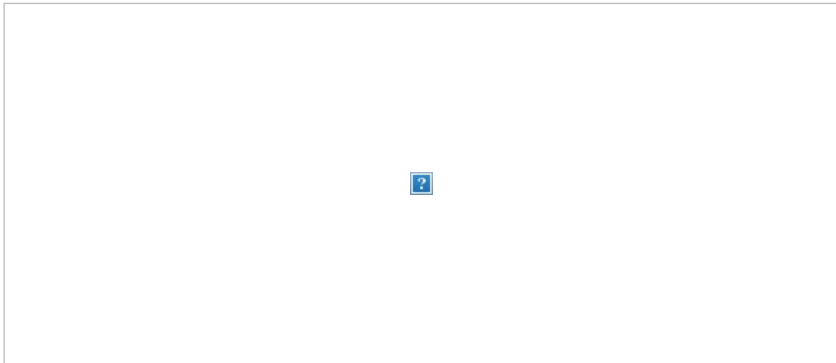
Best regards,

[REDACTED]

Permit comments:



AGR update in response:



[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 [REDACTED]
E: [REDACTED]@beis.gov.uk

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From: [REDACTED]
To: [MS PON15](#)
Cc: [REDACTED]
Subject: Cambo Phase 1 Field Development Environmental Statement - D/4261/2021
Date: Friday, 4 June 2021 16:04:14
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](#)

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: ukop@ogauthority.co.uk
To: [MS PON15](#)
Subject: UKOP: DRA/533 CP/1520/1 (Version 1) Folder Ref: 01.01.01.01-2350U, Chemical Permit: Full Review Delivery
Date: 24 April 2018 10:44:56

Oil and Gas Authority (OGA)

UKOP: UK Energy Portal

For the attention of: [REDACTED]

Subject: UKOP: DRA/533 CP/1520/1 (Version 1) Folder Ref: 01.01.01.01-2350U, Chemical Permit: Full Review Delivery

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For assistance or support email: ukop@ogauthority.co.uk or telephone 0300 067 1682.

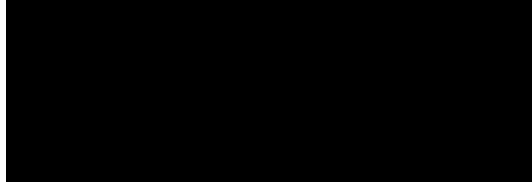
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Cambo Phase 1 Development EIA Scoping Meeting

Participants: OPRED
JNCC
Marine Scotland (MS)
SPE



Date / Time: 23rd March 2018; 13:30 – 15:00

Venue OPRED, AB1 Building, Aberdeen

Minutes

Presentation

SPE presented an overview of the proposed development of the Cambo Field, focusing on the Cambo 204/10a-E appraisal well CAN installation and Phase 1 development.

The Phase 1 reference case was presented, including the ‘worst-case’ footprint from two potential FPSO locations and potential gas export pipeline route. An overview of the timeline for the Phase 1 Development EIA / ES was presented along with plans to survey both the infield area and pipeline route.

An overview of the Blackrock field was presented and a summary of previous studies / activities outlined. Current and proposed activities undertaken by SPE were highlighted. SPE also provided an overview of two suspended wells and SPE’s initial assessment of the risk of an oil pollution incident.

Cambo 204/10a-E Appraisal Well

OPRED enquired whether the CAN technology would be used for the Lyon well or if it is a trial i.e. one off only for Cambo as this stage.

SPE confirmed that the CAN would not be used for the Lyon well as we have insufficient shallow soil data, but there is a potential that it would be deployed for the Cambo development wells. This has yet to be decided.

Cambo Phase 1 Reference Case

MS requested clarification on the number of wells to be drilled during Phase 1. SPE confirmed that the Phase 1 development would have a ‘phased’ drilling campaign (between 2019 and 2023) with 7 producers and 2 water injector wells planned in total for the Phase 1 development.

SPE outlined the plan for clustered wells around manifolds i.e. to have ‘production centres’ rather than ‘drill centres’. SPE highlighted that there is some remaining uncertainty on formation water sulphate content and subsequent reservoir souring and scaling risk which may result in produced water needing to be disposed of overboard.

OPRED stated that the Department would normally expect produced water to be re-injected i.e. through PWRI and queried whether reinjection was being ruled out or is there still a possibility that PWRI would be considered on Cambo. SPE confirmed that PWRI remains a possibility, and will be investigated further in the next stage of design development.

OPRED emphasized that SPE would need to make a strong case to the Department if produced water was not re-injected, and highlighted that the 30-ppm residual oil in water content would not necessarily apply for new developments.

MS enquired whether SPE had any information on profiles at this stage and whether produced water was expected to be significant. SPE confirmed that profiles were available, although these will be subject to further refinement following the forthcoming well test and subsequent modelling work.

MS highlighted that there are likely to be quite a few chemicals used due to the nature of the Cambo oil. SPE stated that hydrate inhibition and demulsifier application is expected to be required, but there is thought to be a relatively low wax deposition/high gel strength risk associated with Cambo oil and therefore there is no plan to routinely use wax inhibitors. OPRED enquired whether SPE had considered insulation of the flowlines. SPE stated that there were no specific plans to do this yet, but flow assurance work is currently on-going. There are no expectations of particular requirements for active heating of the flowlines.

MS enquired whether the FPSO mooring would be chain or rope. SPE confirmed that polyester rope would be used with chain for the upper sections plus lower sections in contact with the seabed. MS highlighted that polyester rope can cause problems for larger fishing vessels as they cannot be detected by sonar. It may be worth talking to the SFF about this; transponders can be attached to the ropes to enable detection by fishermen. SPE stated that the project is at a very early stage of looking at the impacts on the fishing industry, but a fishing intensity study would be conducted and the results fed into the environmental statement.

Cambo Phase 1 Footprint – Infield

MS enquired whether anchors for the FPSO would be piled. SPE stated that this was yet to be confirmed; experience of installing the CAN may open the door to considering suction anchors.

Cambo Phase 1 Footprint – Pipeline

SPE highlighted that the gas to oil ratio is not high for Cambo and that excess gas not used for fuel, would be exported. The current reference case assumes export via pipeline to WOSPs.

OPRED enquired whether SPE had verified capacity to take the excess gas through WOSPs. SPE confirmed that the company understands that there is capacity based on knowledge of the WOSPs system (in which SPE has an interest) and ullage information in the public domain; SPE is expecting to contribute a modest amount, less than 20,000 MMscfd maximum, to the overall throughput.

OPRED raised some concern around the gas export pipeline and whether SPE had considered this in relation to other gas export pipelines in the area. SPE stated that the intent is not to put in a pipeline only for Phase 1, but to make provision for Phase 2 and/or incorporation of other potential future development options and pipeline requirements in the area. SPE will be studying capacity versus line size.

OPRED enquired whether the pipeline would be surface laid. SPE confirmed that this was the assumption.

MS enquired whether there were any known features in the area. JNCC added that more detailed maps are available that show the sponge belt; these would need to be checked to see whether the information on these maps included geological aspects. Action on JNCC to check and revert with information as appropriate.

MS stated that SPE would need to justify why this pipeline route, in relation to other pipeline routes, was considered. SPE need to make sure this is included in the environmental statement.

JNCC reiterated that the fewer pipelines that need to go through the MPA the better.

OPRED enquired whether SPE had identified any technical challenges associated with the pipeline at specific water depths. SPE stated that no specific technical challenges had been identified to date.

JNCC highlighted that SPE had used the term 'minimal rock-dumping' and asked about SPE's understanding of the term 'minimal rock-dumping'. SPE stated that this had not been defined yet. JNCC emphasized that it is preferable to have minimal rock dump, especially through an MPA.

Cambo Phase 1 EIA Scoping and ES Submission Timeline

OPRED, JNCC and MS agreed that they could provide feedback on the EIA Scoping report by mid-April. This was welcomed by SPE.

MS stated that SPE need to be aware of Fisheries Management Measures within MPAs and this need to be included in the ES. Fisheries Management Measures can result in reduced fishing activity within the MPA.

MS highlighted the need to include maps in the ES that show geological features within the MPA and along the pipeline route.

Survey Planning

JNCC was happy with the approach being taken by SPE. JNCC would welcome the opportunity to work with SPE to further define the pipeline survey.

JNCC enquired about the timeline for the surveys. SPE confirmed that planning was underway and surveys would commence as soon as reasonably practicable. SPE also confirmed that infield surveys would be undertaken before any flowlines or other subsea structure were laid on the seabed.

JNCC reiterated that the onus was on the operator to demonstrate that proposed operations will not have an impact on the MPA. This helps to reduce risk overall; if there is not enough information available then there will not be enough to demonstrate that there is no significant impact.

SPE enquired whether photographs would suffice in terms of informing the EIA. JNCC confirmed that photographs and video analysis would be sufficient, on the understanding that other survey data would be presented in future relevant permits.

OPRED also confirmed that if not all information could be included in the EIA / ES then there are conditions that could be attached to the consenting process.

SPE were open to sharing data collected on the environmental survey campaign. JNCC stated that there are forms that need to be completed between the operator and JNCC to enable exchange of assay data.

SPE suggested that a separate meeting between SPE and JNCC to discuss the pipeline survey scope may be beneficial. Both JNCC and OPRED agreed with this approach.

MS highlighted that current plans for the infield survey missed out on any quantified analysis of infauna and enquired whether there was any scope to include this as part of the pipeline route survey. SPE confirmed that this could be accommodated.

MS reiterated the importance of having enough information to 'ground truth' the area e.g. with 1 – 2 grab samples; and being able to tag it on to something that is already being done is beneficial.

JNCC agreed that surveys need to characterise the area, which the existing surveys do, but further 'ground-truthing' is needed.

OPRED requested that the survey scope is shared with the Department once finalized and before the survey commences.

[REDACTED]

[REDACTED]

From: ukop@ogauthority.co.uk
Sent: 03 July 2018 14:49
To: MS PON15
Subject: UKOP: SA/972 GS/777/0 (Version 1) Folder Ref: 01.01.01.01-2709U, Application to carry out a Marine Survey Apply for Consent to Undertake a Geophysical Survey: Full Review Delivery

Oil and Gas Authority (OGA)

UKOP: UK Energy Portal

For the attention of: [REDACTED]

Subject: UKOP: SA/972 GS/777/0 (Version 1) Folder Ref: 01.01.01.01-2709U, Application to carry out a Marine Survey Apply for Consent to Undertake a Geophysical Survey: Full Review Delivery

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MS.PON15@gov.scot

EMT
BEIS
Aberdeen

MARINE SCOTLAND SCIENCE RESPONSE

DRA-533

DR-1299-0 (Version 1)

AGR Direction to Undertake Drilling Operations 204/10a-Cambo E planned well Cambo

In principle, Marine Scotland do not object to an EIA Direction being issued to drill the 204/10a - Cambo appraisal well and conduct an Extended Well Test (EWT), noting that only water based muds will be used (and subsequently discharged).

Marine Scotland would, however, like to highlight the following concerns with this application:

- The assessment describes potential snagging hazards associated with the pre-installed CAN-ductor (and integrated conductor pipe projecting 2 m from the sea bed) and from the well head which it is understood may be left in a suspended state, projecting 2 m from the seabed, for up to 5 years. Whilst it is acknowledged that fishing activity is low in the area and the location of the well head will be charted, it is queried whether the application of a 500m safety zone or an overtrawlable structure around the CAN-ductor and subsequent well head has been considered as further mitigation? It is understood this may be addressed in the 'Consent to Locate' application.
- Marine Scotland welcome that use of the CAN-ductor effectively removes the need to discharge large excesses of cement to the seabed. It is however noted that as a contingency, 300% excess cement from the conductor (if used) and a 100% excess from the surface casing will be discharged to sea, resulting in the worst case discharge of 160 tonnes of cement. Could the operator provide any reference for an excess of 300% being 'completely normal' as stated in the document? Is this an industry standard? How will the discharged cement behave – will this consolidate and set, resulting in the formation of a cement 'patio'? The use of dye is detailed but it is not clear what purpose this serves if the entire 300% excess is to be discharged regardless of the presence of dye at the sea bed? Marine Scotland would like to see further justification for this large excess discharge of cement and detail as to how this represents Best Environmental Practice (BEP) in accordance with Marine Planning Policy 1 of Scotland's National Marine Plan.
- Emissions associated with the Extended Well Test (EWT) appear significant, having a Global Warming Potential (GWP) of 30,744 tonnes of CO₂ and being 2.5 times higher than that of an average well test (based on 2010 figures). The operator states that it is not deemed cost effective to contain and export these hydrocarbons. It is not clear, however, to Marine Scotland how flaring 30,744 tonnes of hydrocarbons represents BEP in accordance with Marine Planning Policy 1 of Scotland's National Marine Plan. Marine Scotland acknowledge that the most recent environmental survey comprised of only an ROV assessment of the top hole location. This is accepted given the similarities between this survey and previous surveys conducted and the apparent lack of change in the environment. It is, however, advised that additional survey work is conducted prior to further development of the Cambo field, in order to ground truth observations and provide robust baseline data from which to measure any impacts of the development. Marine Scotland would like to request a copy of the following survey(s) / report (s) cited in this submission for our archive:

- Gardline (2001). UKCS 204/10 Site Survey Report. Report to Amerada Hess Ltd. November 2001.

- Roterman C & Jones D (2009). Rosebank Visit Report Including CAMboe Sediment Analysis. June and July 2009. SERPENT Project Report.
- FGCERT (2011). Cambo 4 Pre- and Post-Drill Habitat Assessment. Fugro ERT Report No J36124.
- FSLTD (2011). Hess Cambo Environmental Survey UKCS Block 204/5. Fugro Survey Ltd Report NO 00650V2.0.
- Fugro EMU (2013). Cambo 4 Pre- and Post-Drill Habitat Assessment, UKCS Block 204/5. Fugro EMU Ltd.

Minor Issues and general comments:

The application would benefit from a contents page.

Section 3.1.2. (Summary of site and environmental surveys) – Table 3.1 is a useful summary however it would be useful if the location of environmental samples from all surveys was shown on a map.

Section 3.2.3. (Hydrography and metocean conditions) – The section contains a typing error of ‘slope’.

Section 3.3.2. (Benthos) – A citation for ‘Jones, 2009’ is not listed in the references section. Should this be ‘Roterman and Jones, 2009’?

Section 3.3.6. (Marine mammals) – A citation for ‘Hammond et al, 2001’ is not detailed in the references section.

Section 3.4.2. (Offshore conservation) – Marine SPA’s – A Citation for ‘RSPB, 2018’ is not listed in the references section.

Offshore SAC’s – A citation for ‘Rogers, 1999’ is not listed in the references section.

Nature Conservation MPA’s - The following sentence does not read correctly “As part of the ROV based habitat assessment conducted around the proposed Well 204/10a-E well location, an elevated of the potential presence of deep sea sponge aggregated was completed using the video and stills footage gathered”.

Section 3.5.4. (Oil and Gas infrastructure) – The SHEFA-2 telecommunications cable would also benefit from being shown, however, it is acknowledged that this is some 25 km distant.

Section 3.5.5. (Mariculture) – It is advised that Shellfish Water Protected areas are also identified and any potential impacts on these areas discussed. Further information may be obtained here: <http://www.gov.scot/Topics/Environment/Water/15561/ShellfishWaters> and these areas are available to view on the Marine Scotland Maps National Marine Plan interactive NMPI (<https://marinescotland.atkinsgeospatial.com/nmpi/>).

Section 4.1.4. (Conclusion) – The section refers to the ‘brief duration of operations’ as mitigation for the physical presence of the suspended wellhead. It is understood, however, that this well could be suspended for up to five years?

Section 4.3.1 (Overview) – The section refers to a new top hole being drilled in the event that installation of the CAN-Ductor is unsuccessful. Could the operator demonstrate where the new top hole would be located?

Section 4.3.2. (Summary of discharge types and location) – Drill cuttings and muds – tophole sections (pilot well) - The section states that 1,873 tonnes of drilling mud from the first two well sections will be discharged, however table 2.3 states this is 1,900 tonnes?

Drill cuttings and muds – sidetrack well 12 ¼” section – the description does not appear to include the 8 ½” section. Table 2.3 states that there will be 145.6 tonnes of cuttings and 840 tonnes of mud associated with the 12 ¼” sidetrack section and 67.2 tonnes of cuttings and 780 tonnes of mud associated with the 8 ½” sidetrack. This appears to be different from what is stated in this section?

Planned cement discharges – It is not clear why the section states that “up to approximately 300% excess cement may be pumped” when section 2.4.3. states that “the entire excess cement volume will be mixed and pumped”?

Section 4.3.3. (Impact of discharges at the seabed) – Marine Scotland welcome the inclusion of useful observations from adjacent wells. Could the operator comment if excess cement volumes similar to those described for this well were also discharged at these wells? It is understood that post drilling ROV surveys did not distinguish between cement and cuttings in terms of coverage, but could the operator comment on whether any large cement deposits or the formation of cement ‘patios’ was observed?

Section 4.3.4. (Discharges at the sea surface) - It is not clear how comparable the 'Neff 2005' reference is to the environment in this location. Does the reference concern similar depths, substrates, tidal regimes, volumes and composition and type of discharges?

Section 4.4.2. (Summary of discharge types and locations) – Payzone cuttings and muds (8 ½" horizontal sidetrack section) – The section states that in total 67.6 tonnes of drill cuttings and 31.2 tonnes of mud will be discharged, which is not what appears to be shown in table 2.3?

Section 4.4.3. (Environmental Impacts) – Payzone cuttings and mud – The following statement would benefit from a reference "However, typically, when drill cuttings are discharged at the sea surface, resulting concentrations of these discharges in seabed sediments are at most only slightly elevated above natural background levels".

The section states that marine mammals are uncommon in the area which contradicts statements in section 3.3.6 where it states "The waters of the channel support important and diverse populations of whales, dolphins and porpoises" and shows the Cambo location to be adjacent to a migratory route for cetaceans?

Section 4.5.2. (Quantification of atmospheric emissions) – Table 4.2. – It is not clear how the total fuel use for supply vessels was calculated – how much fuel is used per trip?

Section 4.5.3. (Estimating impacts from atmospheric emissions) – Table 4.3 – does CO2 not have a GWP of 1? If so it is not clear why the total GWP is less than the figure provided for the amount of CO2 generated? It is not clear why the NOx figure is a negative figure?

Section 4.5.4. (Environmental impacts) – References to DECC should be updated.

Section 5.1.3. (Fate of an oil spill (oil spill modelling)) – Could the operator comment on whether the expected heavy oil is expected to float or sink?

The following sentence does not read correctly " It would take 7 days for diesel spill to reach Shetland in spring and 5 days in season". The section also states "Diesel was anticipated to have an up to 20% chance of reaching Faroese waters within 3 hours, regardless of summer" should this state regardless of 'season'?

Section 5.1.4. (Major Environmental Incidents (MEI)) – A citation for 'Lobban and Harrison, 1994' is not detailed in the references section.

It is advised that a conclusion is provided which summarises the document and clarifies whether overall the environmental risks are deemed acceptable.

For future applications:

Marine Scotland has commissioned the Sea Mammal Research Unit at the University of St Andrews to provide updated maps showing the distribution of grey and harbour seals around the UK. These 'usage' maps are produced by looking at movement patterns from electronically tagged seals. The resulting patterns of usage are scaled to population levels using data collected in aerial survey counts at haul out sites, to produce estimates of mean density (seals per 5x5 km grid cells). These maps are an update of the previous seal usage maps described in Jones et al. (2015) and it is advised these are referred to in future applications. The maps are available to view on The Marine Scotland National Marine Plan interactive (NMPi) pages (<https://marinescotland.atkinsgeospatial.com/nmpi/>) and further information is available here (<http://www.marine.gov.scot/node/12697>).

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

Regards

[REDACTED]
Offshore Environmental and Chemical Coordinator
25 January 2018

[Redacted]

From: [Redacted]
Sent: Monday, 8 November 2021 13:56
To: [Redacted]
[Redacted]
[Redacted]
News Desk; Director of Marine Scotland Mailbox; F
[Redacted]
Cc: Communications Net Zero & Rural Affairs; News Desk
Subject: RE: POLICY VIEW PLS: Protected 'cheese-bottom' Sponge Belt threatened by controversial Cambo oil field

Hi all,

Nothing to add on to the proposed lines, but please could I flag to [Redacted] flag that in the Technical Review of the EIA (which forms the basis of uplift MCS comments), a number of the comments quoted on page 6-8 are direct quotes from Marine Scotland Science's advice to OPRED on the Cambo EIA from earlier this year. These are presented as comments from Government Reviews, and can be assumed to include Marine Scotland Science as a consultee to OPRED.

Thanks,

[Redacted]

From: [Redacted] <[Redacted]@gov.scot>
Sent: 08 November 2021 13:32
To: [Redacted]
[Redacted]
[Redacted]
[Redacted]
ews Desk <Newsdesk@gov.scot>; Director of Marine Scotland Mailbox <Directormarinescotland@gov.scot>; [Redacted]
[Redacted]
Cc: Communications Net Zero & Rural Affairs <CommunicationsNetZero&RuralAffairs@gov.scot>; News Desk <Newsdesk@gov.scot>
Subject: RE: POLICY VIEW PLS: Protected 'cheese-bottom' Sponge Belt threatened by controversial Cambo oil field

Thanks [Redacted]

Something like this?

"There are duties on all public authorities to ensure that there is no significant risk to achieving Marine Protected Area conservation objectives from their decisions to consent activities. In the case of Oil and Gas development that is the responsibility of the UK Government through the Offshore Petroleum Regulator for Environment & Decommissioning."

Best Wishes

[REDACTED]
Marine Scotland – Marine Planning and Policy
Mob: [REDACTED]

From: [REDACTED] >

Sent: 08 November 2021 13:11

To: [REDACTED]; News Desk
<Newsdesk@gov.scot>; Director of Marine Scotland Mailbox <Directormarinescotland@gov.scot>; [REDACTED]

Cc: Communications Net Zero & Rural Affairs <CommunicationsNetZero&RuralAffairs@gov.scot>; News Desk <Newsdesk@gov.scot>

Subject: RE: POLICY VIEW PLS: Protected ‘cheese-bottom’ Sponge Belt threatened by controversial Cambo oil field

Thanks [REDACTED], and have extended to MS colleagues.

Content with the lines on oil and gas but given the focus on protected species it might be helpful to set out that this is a reserved matter with OPRED having the key role as regulator and has the responsibility to ensure that the MPA is not placed at significant risk – MS colleagues will no doubt want to comment if this should be included / appropriate text.

[REDACTED]

[REDACTED]
Head of Oil and Gas
Oil and Gas

Please note that I am now working from home and available via mobile [REDACTED]

From: [REDACTED] >

Sent: 08 November 2021 12:26

To: [REDACTED]; News Desk <Newsdesk@gov.scot>

Cc: Communications Net Zero & Rural Affairs <CommunicationsNetZero&RuralAffairs@gov.scot>; News Desk <Newsdesk@gov.scot>

Subject: POLICY VIEW PLS: Protected ‘cheese-bottom’ Sponge Belt threatened by controversial Cambo oil field

Colleagues,

We've been approached for comment on the below embargoed release which states new analysis of the sea bed casts further doubt over Shell's proposed North Sea oil expansion.

I've had a look at our system and found the below lines which may suffice for this query. Grateful if officials could take a look and put forth any suggestions/changes by 14:00 please:

A Scottish Government spokesperson said:

“The First Minister has called on the UK Government, who have the power to act in this instance, to urgently re-assess all approved oil licenses where drilling has not yet commenced against our climate commitments. We are wholly committed to ending Scotland's contribution to climate change by 2045, and to ensuring we do it in a way that is just and leaves no-one behind.

“Scotland's current position on oil and gas is clear. Unlimited extraction of fossil fuels is not consistent with our climate obligations. Our focus must now be on achieving the fastest possible just transition for the oil and gas sector - one that delivers jobs and economic benefit, and also ensures our energy security and meets our climate obligations.”

Many thanks

[Redacted]

[Redacted] | Media Manager
Communications Justice and Constitution / External Affairs and Culture
Scottish Government, St Andrew's House
e: [Redacted] [@gov.scot](mailto:[Redacted]@gov.scot)
m [Redacted]

From: [Redacted] [@pa.media](mailto:[Redacted]@pa.media)>
Sent: 08 November 2021 11:35
To: [Redacted] [@gov.scot](mailto:[Redacted]@gov.scot)>
Subject: FW: EMBARGOED for 00:01 on 9th Nov: Protected 'cheese-bottom' Sponge Belt threatened by controversial Cambo oil field

Hi [Redacted]

I'm just forwarding this for comment. If you are sending any response after 3pm please could you copy in pascotland@pa.media

Thanks.

[Redacted]



[Redacted]

Reporter
Glasgow

M [Redacted]

Registered Address: PA Group Limited, 37 N Wharf Road, Paddington, London, W2 1AF
Registered in England No.4197
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From: [REDACTED]@upliftuk.org>

Sent: 08 November 2021 09:55

To: [REDACTED]@upliftuk.org>

Subject: EMBARGOED for 00:01 on 9th Nov: Protected 'cheese-bottom' Sponge Belt threatened by controversial Cambo oil field

Protected 'cheese-bottom' Sponge Belt threatened by controversial Cambo oil field

New analysis of the sea bed casts further doubt over Shell's proposed North Sea oil expansion

Glasgow, EMBARGOED for 00:01 on 9th November 2021

Sensitive deep sea sponges and 400 year-old clams could be among the protected marine life impacted by the Cambo oil field off the coast of Shetland, according to a new scientific review by the Environmental Law Alliance Worldwide (ELAW).

Already, Boris Johnson is under intense pressure to reject Cambo's imminent approval due to its impact on the climate, as he hosts the COP26 climate talks.

[REDACTED], Head of Conservation Scotland at the Marine Conservation Society: "The UK Government presents itself as a global leader on climate change and ocean protection, committing to protect a third of the ocean by 2030. It now needs to act on these promises and protect this precious sponge belt from Shell. The sponge beds and associated species are incredibly sensitive deep-sea habitats. Construction, movement and potential leaking from this pipeline could have devastating consequences for deep-sea sponge and protected features already under pressure from damaging activities such as deep-sea trawling.

"Against the twin climate and biodiversity crises, Boris Johnson must heed the message from scientists when they say there can be no new oil and gas developments, like Cambo, if we want a liveable climate, and the Scottish Government must ensure the adequate protection of this vulnerable sponge belt from all impacts."

Pipelines to export the oil from the Cambo field are set to cut through approximately 35 kilometres of the Faroe-Shetland Sponge Belt, which is a UK Marine Protected Area. It is home to rare, deep-sea sponge habitat, known as "cheese-bottoms" by fishers, and ocean quahogs, a type of clam that can live for hundreds of years, making it one of the oldest living animals on Earth. Both species are listed as "threatened" by the OSPAR Commission.

This week, 16 marine protection and climate groups wrote to the offshore oil and gas environmental regulator, OPRED, asking it to include marine impacts when assessing Cambo’s drilling application. They raised concerns about the likely impacts the pipelines will have on the seabed, on hundreds of marine species and on the local fishing industry, and underline the devastation that an oil spill in the area would cause; risks that have been seriously downplayed by Cambo’s operator, Siccar Point Energy, according to ELAW.

Shell and private-equity backed Siccar Point Energy want permission to extract 170 million barrels of oil in the first phase alone, which would generate emissions equivalent to the annual carbon pollution from 18 coal-fired power stations. Ever rising emissions – driven by new fossil fuel developments like Cambo – are having an alarming impact on the ocean, including changes to major currents and their chemical makeup. As a result, scientists are demanding an immediate end to all new oil and gas projects, like Cambo.

██████████, **director of Uplift said:** “These critical climate talks have two goals: enormous global cuts to carbon emissions and the protection and restoration of the natural world. And yet, just a couple of hundred miles north of Glasgow, COP26’s hosts are considering doing the complete opposite. This new oil field will contribute to the climate crisis while potentially damaging a sensitive underwater world. Everyone loses except the oil companies. The UK government must protect its seas, lead the world beyond oil and gas and say “no” to Cambo.”



Contacts

██████████, Uplift: ██████████ [@upliftuk.org](mailto:██████████@upliftuk.org); ██████████

Notes

- The letter to OPRED can be accessed [here](#). Signatories to the letter are: Uplift, Marine Conservation Society, RSPB, Scottish Wildlife Trust, Ocean Rebellion, Fauna & Flora International, Blue Marine Foundation, WWF-UK, Sustainable Inshore Fisheries Trust, Surfers Against Sewage, Fidra, Oceana, Greenpeace UK, Wildlife and Countryside Link, Friends of the Earth Scotland and Whale and Dolphin Conservation.
- The full Technical Review by the Environmental Law Alliance Worldwide can be accessed [here](#).
- A briefing on the Cambo oil field can be accessed [here](#).

- OSPAR List of threatened and/or declining species and habitats information on [Deep-Sea Sponge Aggregations](#) and [Ocean Quahogs](#).
- A recent [survey](#) of the Sponge Belt by the Joint Nature Conservation Committee, which advises the UK Government on nature conservation, details many of the marine species living in the Faroe-Shetland Sponge Belt Marine Protected Area, including: Basket stars – a relation of starfish; cauliflower corals; rays, octopus and chimaera – voracious predators sometimes known as ghost sharks. It is also home to squat lobsters, giant sea spiders and the sea mouse, which is in fact a hairy worm!
- The [International Energy Agency](#) has said there can be no new oil and gas developments if we are to limit global temperature rise to within 1.5 degrees. The [UN Secretary General](#) has said that the latest report from the IPCC “must sound a death knell” for fossil fuels and that countries should “end all new fossil fuel exploration and production”. “Approving the Cambo oil field off Shetland would be flatly inconsistent with the science,” according to leading [climate scientists](#).
- A summary of the Cambo Project, including Siccar Point Energy’s environmental statement, can be found on the [BEIS website](#).

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Cambo Well (204/10a-E) Proposed Habitat Survey Scoping Meeting

Participants: OPRED
JNCC
Marine Scotland (MS)
SPE



Date / Time: 5th May 2017; 13:30 – 14:30

Venue OPRED, AB1 Building, Aberdeen

Minutes

Presentation

SPE presented an overview of the location of the proposed 204/10a-E well in relation to its distance to previous wells within the Cambo field and previous environmental surveys that had been undertaken in the area. A summary of findings from previous studies was also presented.

The proposed plan for the habitat survey scope was presented and discussed.

Discussion and Advice

MS enquired whether there was any swathe bathymetry data available for the area. SPE confirmed that the Cambo 1 survey data included bathymetry, but also highlighted that existing seismic data for the area is currently being re-processed for the purposes of a shallow hazards assessment. This data, if re-rendered, could be used to create a bathymetric image of the well location.

JNCC and MS both recommended that it would be beneficial if SPE could use re-processed side scan data to inform the proposed survey. This would assist when planning transects for the survey. OPRED agreed with this approach and highlighted the benefits of being selective in planning the survey scope. OPRED also stated that no invasive sampling methodology would be required for the survey.

OPRED expressed an appreciation of the proposed work scope by SPE. OPRED confirmed that no consent is required for the survey, only a Notification; submitted via the Energy Portal.

OPRED also confirmed that no Environmental Statement will be required for the proposed Cambo well. The last well drilled in the Cambo field was undertaken on a PETS (Portal Environmental Tracking System) application, so the same should apply in this case. A good quality submission will be required.

If specific habitats, e.g. deep sea sponge aggregations, are found during the survey, JNCC request that they are referenced correctly within the final habitat assessment report. For example, the report should provide the correct definition of what constitutes a sponge belt.

SPE may also find the following JNCC guidance useful:

- Impacts of drilling west of Shetland
- Assigning Benthic Biotopes using EUNIS or the Marine Habitat Classification of Britain and Ireland (http://jncc.defra.gov.uk/pdf/Report_546_web.pdf) - for any future grab sampling.

JNCC stated that it would send SPE the links to the relevant reference material.

In addition, if sponges are found, their density, per 1m², should be represented within each picture / photo. A representative selection of photos should be included in the report and referenced to the appropriate place on a map.

Marine Scotland requested that the following reference material is used to inform the DR EIA SAT Application and referenced appropriately:

- National Marine Plan interactive (NMPi)
- Feature Activity Sensitivity Tool (FEAST)

Marine Scotland also requested that the Application should include a map of predicted sediments and information on known habitats at existing well sites.

Future Applications

OPRED referred to the new EIA Regulations and stated that Guidance on the new requirements was currently in draft form. Key changes include the need to:

- Consider the operational effects over the lifetime of the project, and
- Consider potential accidents and disasters.

Other changes made under the new Regulations are already being effected so no real change there.

Other

OPRED will sent SPE an example pre-spud letter. This will eventually be sent to the appointed Well Operator.

[REDACTED]

From: ukop@ogauthority.co.uk
Sent: Monday, 22 January 2018 10:54
To: MS PON15
Subject: UKOP: DRA/533 EWT/1300/0 (Version 1) Folder Ref: 01.01.01.01-2350U, Direction(s) under the EIA Regulations Direction to Undertake an Extended Well Test (EWT): Full Review Delivery

Oil and Gas Authority (OGA)

UKOP: UK Energy Portal

For the attention of: [REDACTED]

Subject: UKOP: DRA/533 EWT/1300/0 (Version 1) Folder Ref: 01.01.01.01-2350U, Direction(s) under the EIA Regulations Direction to Undertake an Extended Well Test (EWT): Full Review Delivery

A full review requiring your response has recently been delivered to your workbasket. Use the URL below to login to your workbasket. There you will be able to manage and respond to this review.

Use the following URL http://itportal.ogauthority.co.uk/eng/fox/live/PORTAL_LOGIN/login to visit the UKOP (UK Energy Portal) login page.

For assistance or support email: ukop@ogauthority.co.uk or telephone 0300 067 1682.

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[REDACTED]

From: [REDACTED] <[REDACTED]@SiccarPointEnergy.co.uk>
Sent: Tuesday, 30 June 2020 13:52
To: MS PON15
Cc: [REDACTED]
Subject: RE: Cambo Phase 1 Field Development Environmental Statement - D/4240/2019 - Additional Information
Attachments: Cambo ES (D-4240-2019) Additional Information.pdf

Good afternoon,

Further to my e-mail below, the additional information document in relation to the Cambo Field Development Environmental Statement (ES Ref: D/4240/2019) has been amended slightly following recent communications with BEIS OPRED.

Please find this amended additional information attached. The minor amendments relate to responses made by SPE to the following comments: 5, 7(iii), 7(iv), 8(i), 68(i), 80(iv) and accurately reflect responses made directly to BEIS OPRED.

Please note that with the additional information document being updated and re-issued, Marine Scotland now has until the 30th July to make representations to the Secretary of State.

Kind regards,

[REDACTED]

From: [REDACTED]
Sent: 25 June 2020 16:45
To: MS.PON15@gov.scot
Cc: [REDACTED]@siccarpointenergy.co.uk>
Subject: Cambo Phase 1 Field Development Environmental Statement - D/4240/2019 - Additional Information

Good afternoon,

Under Regulation 10(2) of the Offshore EIA Regulations, Siccar Point Energy E&P Limited (SPE) has been requested by BEIS to provide additional information in relation to the Cambo Field Development Environmental Statement (ES Ref: D/4240/2019). SPE is required to serve Marine Scotland Science with a copy of the additional information.

Please find attached a cover letter detailing the timeline for the consultation and another file containing the public notice and additional information.

Kind regards,

[REDACTED]

[REDACTED]
HSE Advisor

Siccar Point Energy Limited
3rd Floor, H1
Hill of Rubislaw
Anderson Drive

Aberdeen, AB15 6BY

Switch: 01224 678008

Mobile: [REDACTED]

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0131 244 [REDACTED]
MS.PON15@gov.scot

EMT
BEIS
Aberdeen

MARINE SCOTLAND SCIENCE RESPONSE

DRA-533
CP-1520-0 (Version 2)
AGR Chemical Permit 204/10a-Cambo E planned well Cambo

Marine Scotland, Marine Laboratory has reviewed the Chemical Risk Assessment included in the above Chemical Permit.

We entered into discussion with the operator with regard to incorrect RQs, incorrect BDFs used, insufficient justification for an RQ>1, inconsistencies between Table 1 and the portal entries for cementing products and other minor discrepancies in the text.

The operator provided the information in an Update and submitted this to the BEIS PORTAL.

During cementing of the 36" x 30" conductor and the 13 3/8" surface casing there were initially expected to have high percentages of cement discharged. However as the CAN-ductor has now been installed it is more likely that the drilling of the 42" tophole section will not take place removing the potential for the use of 300% cement.

Marine Scotland agrees with all the generated RQs apart from one which could not be emulated. However the RQ was <1 therefore of low environmental impact. This is the discharge of LD-8e throughout all drilling sections, where Marine Scotland generates a maximum RQ of 0.011 using both our CHARM spreadsheet and the operators. The error has been identified and the operator has confirmed this will be updated on a future variation.

Adequate Justification was provided for RQs>1, those with substitution warnings and other products of an environmental concern.

Therefore we can confirm that Marine Scotland has no objections to a Chemical Permit for this application.

Marine Scotland advise that the following comments should be addressed in a future variation/submission.

1. A review of the volume of cement potentially required for the contingency conductor has meant the total use and discharge quantities of Portland Cement has been reduced. Changes have been made to Table 1 of the Chemical Risk Assessment however the portal entries are unchanged. Please amend to correlate with the lower amounts in Table 1.

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

Regards
Marine Laboratory, PO Box 101, 375 Victoria Road,
Aberdeen AB11 9DB
www.scotland.gov.uk/marinescotland



Offshore Environmental and Chemical Coordinator
27 March 2018

