

## Representation - Draft Modification Report UNC 0607

### Amendment to Gas Quality NTS Entry Specification at the St Fergus NSMP System Entry Point

Responses invited by: **5pm on 09 November 2017**

To: [enquiries@gasgovernance.co.uk](mailto:enquiries@gasgovernance.co.uk)

<b>Representative:</b>	Andrew Pearce
<b>Organisation:</b>	BP Gas Marketing
<b>Date of Representation:</b>	9 November 2017
<b>Support or oppose implementation?</b>	Support
<b>Relevant Objective:</b>	<p><b>a)</b> Positive</p> <p><b>d)</b> Positive</p> <p>(i) <i>between relevant shippers;</i></p> <p>(ii) <i>between relevant suppliers; and/or</i></p> <p>(iii) <i>between DN operators (who have entered into transportation arrangements with other relevant gas transporters) and relevant shippers.</i></p>

**Reason for support/opposition: Please summarise (in one paragraph) the key reason(s)**

The proposed modification will help maximise gas production from the Rhum gas field in UKCS thereby supporting the UK Government in its stated aim of maximising the economic recovery of UK oil and gas (MERUK). Maximisation of domestic gas production will reduce reliance on overseas imports and will enhance the security of supply of gas for the UK. Thorough analysis during the workgroup process has demonstrated that the requested change in carbon dioxide limit can be accommodated due to the fortuitous comingling that can be expected to occur and it is highly unlikely that gas of 5.5mol% CO<sub>2</sub> could flow onto the NTS as a result of the proposal. If the proposal is not implemented then the impact would be the early cessation of production from the Rhum, Bruce and Keith fields (validated by the OGA), which accounts for approximately 5% of the UK national gas supply.

**Self-Governance Statement:** *Please provide your views on the self-governance statement.*

N/A Panel determined it should be Authority Direction

**Implementation:** *What lead-time do you wish to see prior to implementation and why?*

Implementation should be as soon as possible after approval as there is no reason to delay. Our rationale for this is to maximise economic recovery of UK oil and gas as soon as possible

**Impacts and Costs:** *What analysis, development and ongoing costs would you face?*

The Rhum owners are in discussion to amend the Transportation and Processing Agreement with NSMP to allow implementation of the modification in the expectation that the modification will be approved.

**Legal Text:** *Are you satisfied that the legal text will deliver the intent of the Solution?*

N/A - as this is an enabling modification no UNC legal text is required. BPGM are satisfied with the suggested text to modify the NEA.

**Are there any errors or omissions in this Modification Report that you think should be taken into account?** *Include details of any impacts/costs to your organisation that are directly related to this.*

No.

**Please provide below any additional analysis or information to support your representation**

None