Flaring and venting during commissioning

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Under the Energy Act 1976 and the Petroleum Act 1998, operators are required to have Consents in place for the flaring and venting of hydrocarbons during commissioning and production operations. The OGA is committed to eliminating any unnecessary or wasteful flaring and venting of gas.

Here you will find a summary of the process involved in gaining consent for the flaring and venting of gas during the commissioning phase of a development.

**Guidance on applications for flaring and venting consents for commissioning**

During the commissioning of production facilities flaring and venting consents will usually be restricted in duration to between one and three months and will be for a fixed quantity of gas based on an auditable programme. Once commissioning is complete and stable operating conditions have been achieved the duration of the flaring consent will be increased and will be subject to an agreed cumulative maximum for the period.

Note that the Energy Act 1976 and Petroleum Act 1998 have slightly different definitions of the gases emitted.

For vent consents under the Energy Act 1976, both the inert gas and hydrocarbon fraction obtained from the licensed area should be given, and the combined rate for both will be the basis for the consent.

For flaring under the Petroleum Act 1998, only the hydrocarbon fraction flared from the licensed area requires consent but the OGA will require the inert gas content of the flare to be provided for information.

**The following principles shall be adhered to:**

*Commissioning Philosophy:* Gas flaring and venting during commissioning should be kept to the lowest level that is consistent with the safe and efficient commissioning of oil and gas related plant.

*Installation and hook-up:* All gas plant must be complete, fully leak tested and otherwise tested and commissioned as far as is practicable, and able to receive gas, before first oil. A gas flaring consent will not be issued until the OGA is satisfied that the system is ready to receive gas as soon as stabilised flow is achieved.

*Commissioning and planning:* This should be based on the assumption that, within one week of first oil, gas will be being used to commission gas handling plant. If gas plant commissioning cannot begin within two weeks of first oil, or there is a significant delay in commissioning due to plant breakdown or malfunction, the OGA may need to consider limiting production until gas plant commissioning can proceed.

*Commissioning gas flaring and venting consent applications:* A flare and/or vent consent must be obtained from the OGA prior to any gas being flared or vented. These are applied for using the UK Energy Portal. For flare and vent consents associated with *commissioning* of facilities, Operators must submit supporting documentation to the OGA, detailing the commissioning procedure, and the expected flare and vent volumes associated with the commissioning plan. The OGA will review this documentation and if satisfied that the commissioning plan achieves the lowest level of flare/vent that is consistent with the safe and efficient commissioning of oil and gas related plant, then the flare and vent figures can then
be used as the basis for the flare and vent consent application (to be submitted via the UK Energy Portal).

Supporting documentation should be submitted at least two to three months before expected production start-up. Depending on the complexity of the facilities to be commissioned and/or the size of the project, the requirements of the supporting documentation may differ. Advice on the level of detail required should be sought from the OGA. As a minimum, the documentation should contain:

- A brief overview of the field and associated main facilities.
- A detailed description of the plant commissioning philosophy and procedure, including gas export line commissioning should this be applicable.
- The commissioning schedule.
- A summary of the main flaring assumptions.
- Flaring and/or venting calculations - on a daily basis and total quantities
- Sketches and figures should be as follows:
  - High level field layout
  - Process flow diagram
  - Gas compression, dehydration, gas export and fuel gas systems

Commissioning flare and vent consent application process: Commissioning flare and vent consents issued by the OGA are ‘Short Term’ consents, normally between one and three months in duration. The commissioning consent is intended to cover the period from first oil or gas to achieving stable plant operations. It is a requirement of these consents that the operator shall provide weekly reports to the OGA detailing the following information relating to the previous week’s activity:

- a short technical summary of the performance of the gas handling plant, highlighting any features which have affected or could affect the operation of the plant;
- an update on commissioning activity progress and main works planned for the forthcoming period;
- daily rates in respect of oil production, gas production, gas export, gas used for fuel and of gas flare;
- cumulative average for production and flare; and
- gas compression plant uptime.