



Oil & Gas  
Authority

# MER UK Forum and Boards

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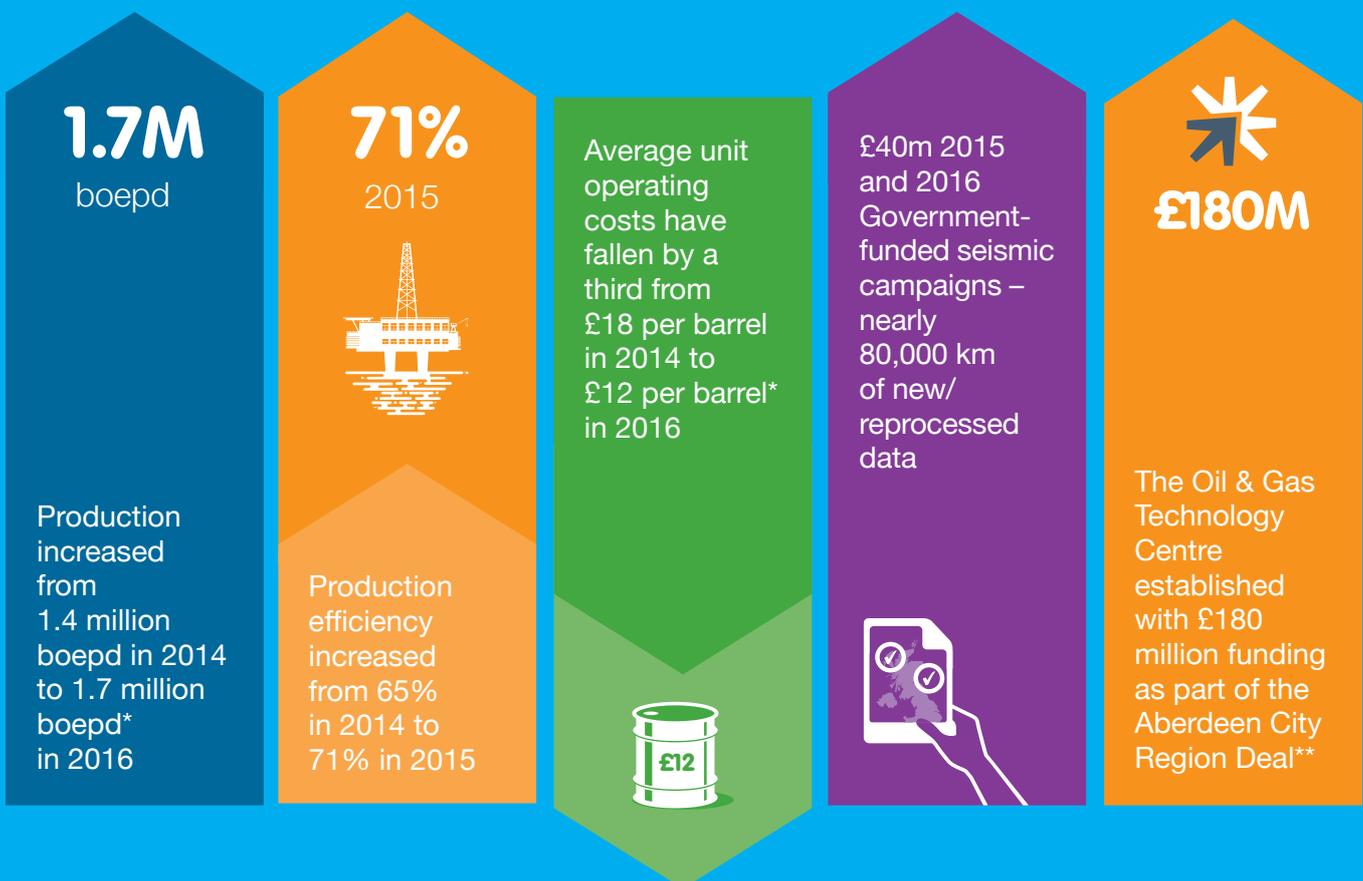
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\* provisional data as at February 2017

\*\*The Aberdeen City Region Deal is supported by the Scottish Government, UK Government, Aberdeen City Council, Aberdeenshire Council and Opportunity North East.



## Andy Samuel

### Chief Executive, OGA

Welcome to the first Annual Update summarising the work of the Maximising Economic Recovery (MER) UK Boards, which report into the MER UK Forum, both of which have now been in existence for over a year. We are very grateful for the active participation of senior industry leaders and ministers from both the UK and Scottish governments.

The work of the forum and boards has continued amid difficult market conditions. The service sector in particular has been hard hit. However the last year has seen some strong progress, for example with increases in production, production efficiency and exploration success rates.

Unit operating costs are now considerably lower, thanks to the work of operators, service companies and the Efficiency Task Force which has played a significant role in helping industry work together to become more efficient on a sustainable basis.

The boards and their workgroups feature a wide spectrum of participants; from industry leaders to subject matter experts and government officials and are an important vehicle for engagement. There have been a number of highlights. The Exploration Board, for example, helped define the areas studied as part of the government-funded seismic campaigns along with the areas opened up for licensing in the 29th round. The OGA also worked closely with industry through this board in designing the new 'Innovate' flexible licensing regime. Likewise the Asset Stewardship Board helped influence the creation of expectations which underpin the OGA's Asset Stewardship Strategy.

In order to ensure the forum and boards remain focused on the right priorities a review was undertaken in early 2017. Details can be found on Page 4.

I hope you find this update useful. We look forward to updating you on many more achievements as we work together to maximise value from the significant remaining potential across the UKCS.



## Deirdre Michie

### Chief Executive, Oil & Gas UK

2016 was a turbulent year for the UK oil and gas industry as it continues to steer its way through one of the toughest downturns in the sector's history.

However, amid the challenges, in successfully establishing itself as a Gov Co the OGA has done some remarkable work in a very short period of time. The constructive and positive working relations building between the new Oil and Gas Authority, Oil & Gas UK and the industry as whole is a credit to all concerned as we drive forward towards our joint goal of Maximising Economic Recovery of UK oil and gas.

The steps being taken by the industry to improve its competitiveness and secure long term efficiency gains have benefitted from the support from government and the OGA, and are helping reposition the UK as a more attractive place to do business in. But we all know that there is still much to do and the changes we are now beginning to see in industry practice and behaviours still have some way to go before they become truly systemic. The OGA can continue to take a key role in challenging the industry to constantly raise the bar in terms of its performance and its collaboration.

In 2017, our focus on efficiency and competitiveness must continue to be relentless if we are to attract further investment into the basin and stimulate much-needed activity.

There are still billions of barrels of oil and gas to be recovered from the North Sea and exciting prospects for a sector supported by a world class supply chain. Working collaboratively together we can and will ensure an attractive future for our industry for decades to come.

## Overview and Way Forward

### MER UK Forum

The purpose of the MER UK Forum is to support the delivery of MER UK and maximise UK value from the oil and gas industry as a whole.

Bringing together government, industry and the OGA, the MER UK Forum provides strategic direction, oversight and support, helping to create alignment, accountability and collective action on key priorities. Government ministers, industry leaders and representatives of the OGA attend the meetings.

### MER UK Boards

Seven core work areas were identified and a dedicated MER UK Board oversees each of these. Some of these already existed, such as the Technology Leadership Board (TLB) and the Oil & Gas UK Efficiency Task Force, while others such as the Decommissioning Board, were newly created. Each MER UK Board has been led by an industry representative, with support from the OGA and Oil & Gas UK. The boards have delivered tangible and quantifiable results, and have communicated progress to the MER UK Forum and to the wider industry. The boards have also been an important vehicle for engagement and consultation, and a focal point for related working groups.

### Review of activities

Acting on feedback, and to ensure the forum and boards remain focused on the right priorities, a review was undertaken. In January 2017, a meeting was held with the industry board leads and representatives from the OGA and Oil and Gas UK. At this meeting a new approach for both the Forum and Boards was endorsed.

Going forward, the number of boards will be reduced from seven to six. The Regional Development and Infrastructure Board has been disbanded after carrying out some excellent work which has been successfully completed. A new MER UK Steering Group has been set up, and the boards will be renamed Task Forces with the exception of the Technology Leadership Board which is a well-established brand.

The Steering Group will have 12 members and will be co-chaired by Andy Samuel, OGA and Greta Lydecker, Chevron. They will meet at least twice a year and agree topics to be discussed at the MER UK Forum, have oversight of the six Task Forces and provide assurance on the delivery of their activities, they will also discuss and review key strategic issues.

### Further details

Further details can be found at:

<https://www.ogauthority.co.uk/about-us/mer-uk-forum-boards/>  
<http://oilandgasuk.co.uk/cost-efficiency.cfm>

Figure 1: Oil & Gas MER UK Forum and Boards



# Exploration Board

The Exploration Board, which is comprised of both major and independent operators, works to revitalise exploration in the UK Continental Shelf (UKCS) in order to add reserves to replace production and secure longevity of the basin.

In Frontier areas, the board, with the help of a number of task groups, has helped determine the areas for new seismic acquisition and reprocessing, developed the 'Innovate' Licence and supported a number of regional studies.

For the more mature areas, the board has advised on approaches to licensing and also endorsed the rigour being applied by the OGA in pre, syn and post well evaluations.

The focus in 2017 is on attracting investment, delivering future activity, supporting licensing rounds and geophysical technologies.

## 2016 Priorities

1.	Revitalise Exploration	Promote exploration and incentivise investment
2.	Technical Assurance	Improve technical understanding of the UKCS potential and undertake successful exploration campaigns
3.	Licensing	Optimise licensing terms and conditions to maximise frontier and mature potential

## Highlights

Provided input and influence to the development of the Exploration Strategy, which was published by the OGA in October 2016 and which describes the OGA's approach to revitalising exploration. This includes working with the industry to enhance exploration investment, integrating exploration into regional development plans, acquiring and publishing new geophysical data, and licensing underexplored and more mature areas of the UKCS

The Board agreed that an Exploration Managers' Forum should be established in London and Aberdeen, meeting on a quarterly basis, including members from a variety of operators. They met most recently at the PROSPEX 2016 conference

Designed the programme for promoting the UKCS at domestic and overseas conferences targeting the most relevant events to highlight the significant opportunities that exist in the basin to the most appropriate audience

The 'Innovate' Licence developed by task group and implemented for the 29<sup>th</sup> Offshore Licensing Round. The 'Innovate' Licence offers a flexible and pragmatic approach to licensing and allows licensees to work with the OGA to design an optimal work programme. This enables more appropriate phasing of activity, rental fees and competency tests and implements a stage-gate process for better monitoring of progress

Provided oversight, together with subcommittees, for the BGS Palaeozoic Study as part of a wider initiative to evaluate the remaining petroleum potential of previously overlooked or under-explored areas of the UK Continental Shelf to coincide with opening of the 29<sup>th</sup> Offshore Licensing Round

Areas selected (East Shetland Platform and South West Britain) for geotechnical studies by the 21<sup>st</sup> Century Roadmap Technical Advisory Committee to support the 2016/17 government-funded Seismic Programme

Evaluations undertaken for industry seismic group shoots, as part of a collaborative approach to share costs and improve quality

# Asset Stewardship Board

The Asset Stewardship Board works to enhance and improve asset stewardship by maximising value through improving safety, efficiency and reducing cost.

The Asset Stewardship Board, which consists of both operators and service sector members, worked very effectively during 2016 with significant input into the OGA's Asset Stewardship Expectations to define and deliver good practice across the whole asset lifecycle.

The Asset Stewardship Board has also supported the Production Efficiency Task Force (PETF) and enabled the setting up of an Enhanced Oil Recovery (EOR) Task Group.

Extensive support was also given to project optimisation with eleven major projects reviewed to provide a lessons learned report to industry which will be published by the OGA in Q1 2017.

The focus in 2017 is on base management, integrity management, transfer of learnings and monitoring the delivery of 2016 priorities.

## 2016 Priorities

1.	Asset management and integrity	Improve asset management and integrity, Increasing production and reducing costs
2.	Project delivery	Deliver projects within schedule and budget
3.	Increase recovery	Improve overall recovery factor and deliver EOR reserves

## Highlights

Provided input and influence to the development of the Asset Stewardship Strategy which was published by the OGA in October 2016 and which clearly defines what good asset stewardship is and how the OGA's asset stewardship process will work

Provided input and influence to the development of the Enhanced Oil Recovery (EOR) Strategy and EOR Delivery Programme which aims to drive economic development of 250 million boe incremental reserves primarily through polymer EOR over the next decade. The board also endorsed the establishment of the EOR Task Group

Review and input into the OGA Production Efficiency (PE) report which indicates sustained production performance improvement on the UKCS with an average production efficiency of 71% across the industry. This is an increase of 6% from the previous year equating to 8.43 mboe extra production for every 1% increase in PE

Provided governance and steer on how to generate lessons which would be useful to industry. The deliverable being the OGA's soon to be published 'Lessons from UKCS Oil & Gas Projects 2011–2016' report to be published by end Q1 2017. The report analyses 58 major projects executed over the past five years. This detailed analysis shows that less than 25% of the projects were delivered on time and that on average they were 35% over budget and 10 months late. In order to better understand how projects are being executed in the UKCS, structured lessons learned events were held on 11 different projects. This report will take the common lessons harvested from these reviews and will presents a series of recommendations that, if implemented, will improve future project delivery in the UKCS

Provided strategic direction (early 2016), co-authoring and peer review (later in 2016) to the Asset Stewardship Expectations which were published in October 2016 with implementation guidance to follow in Q1 2017. These good practice expectations are aligned with the MER UK Strategy supporting obligations and are designed to help achieve consistent stewardship performance

Production Efficiency Task Force a) delivered shutdown best-practice b) established a gas compression workgroup to focus on what is one of the top loss of production categories c) kicked-off an onshore terminals workgroup to develop terms of reference for improving infrastructure efficiency

# Technology Leadership Board

The Technology Leadership Board (TLB) brings together industry, government and other stakeholders. The TLB's goal is to develop and drive a technology strategy aligned to delivering MER UK and to strengthen the UK oil and gas industry's competitiveness.

Advances in technology have the potential to transform development, production performance and cost effectiveness in the UKCS. The TLB aims to be a catalyst that helps drive the development of more innovative technology which can have a similar effect in the future.

The five key technology themes: well cost reduction, small pools, integrity management, digital data and decommissioning, are being worked via task groups. Unsanctioned discoveries, and in particular small pools, represent a very significant opportunity to maximise economic recovery from the UKCS and this was highlighted by the UK Continental Shelf Unsanctioned Discoveries\* Information Pack which was published in October 2016.

Of particular importance in 2016 was the establishment of the Oil & Gas Technology Centre (OGTC), based in Aberdeen, which will help ensure the UK amasses a wealth of expertise in mature and late life technology solutions. The TLB is already working closely with the OGTC, who have a vital role to play in helping to develop the new technologies under the five key technology themes.

The focus in 2017 is on working with others to ensure technology priority themes are progressed, overseeing plans and progress on established priority themes and defining the priority scope, business cases and plans for big data analytics and decommissioning.

## 2016 Priorities

1.	Undeveloped discoveries (Small pools)	Unlock economic recovery of unsanctioned discovered hydrocarbons in small and/or difficult accumulations by reducing 'all in' costs by 30 to 50%
2.	Wells	Reduce total well costs by 50% to increase drilling activity and develop resources
3.	Asset integrity	Enhance asset inspection to improve production efficiency and reduce maintenance costs
4.	Digital technology	Stimulate use of digital technology to reduce costs and unlock reserves
5.	Decommissioning	Development and deployment of new technology will support the MER UK target of delivering at least a 35% reduction in UKCS decommissioning costs

## Highlights

The TLB has undertaken close and regular liaison with the Oil & Gas Technology Centre (OGTC), to ensure alignment of technology development and deployment

Provided input and influence to the development of the Technology Strategy which was published in September 2016, and which supports the achievement of the MER UK objectives and the growth of net exports of technology equipment and services by the UK-based service sector

Provided input and influence to the development of the Technology Delivery programme which will be published in 2017

Five key technology themes being worked via task groups:- well cost reduction, small pools, integrity management, digital data and decommissioning

Provided input and influence to the development of the UK Continental Shelf Unsanctioned Discoveries Information pack published by the OGA highlighting the significant contribution the exploitation of circa 225 small pools of hydrocarbons, defined as discoveries of oil or gas accumulations between 3 and 50 million barrels of oil equivalent, can make to achieving MER UK. These small pools have total estimated recoverable reserves (P50) of 2.4 billion barrels of oil equivalent

# Decommissioning Board

The shared goal of the MER UK Decommissioning Board is to minimise the cost of decommissioning in an appropriate manner.

Whilst other MER UK Boards are working vigorously to ensure that field life is extended and key production hubs are not removed prematurely, it is a fact that decommissioning will ultimately occur for all installations. The Decommissioning MER UK Board is working to establish a respected, stable and sustainable decommissioning industry, ensuring timely and good value decommissioning activity effectively minimising costs and maximising economic recovery through collaboration and fit for purpose lifecycle planning, policies, solutions and execution.

The board has made significant progress this year. Task Groups have been established to consider and address the key challenges and opportunities facing the sector. Cost reduction is a major priority and innovative new approaches can deliver really significant cost savings. There is also a strong opportunity for a UK market with the necessary capacity and capability. This is an area that is being looked at under delivery capability models and where the board liaises closely with the Supply Chain, Export and Skills Board.

In 2017 the focus is on cost certainty and reduction, regulatory guidance and delivery capability.

## 2016 Priorities

1.	Cost certainty and reduction	Deliver a >35% cost reduction through campaigns and by working with the Technology Leadership Board on new solutions
2.	Regulatory Guidance	Work with the Department for Business Energy and Industrial Strategy (BEIS) Offshore Decommissioning Unit to enhance understanding of current policies, legislation, related guidance and derogations and deliver effective stakeholder management
3.	Delivery Capability	Understand supply-demand requirement creating capability, cost effective solutions and partnership models between operators and contractors

## Highlights

Provided input and influence to the development of the Decommissioning Strategy which was published by the OGA in June 2016. The Strategy summarises current cost projections, outlines efficiency improvements and transformative options that will support the delivery of MER UK and sets out three clear priorities: cost certainty and reduction; decommissioning delivery capability; and, decommissioning scope, guidance, and stakeholder engagement

Provided input and influence to the development of the Decommissioning Delivery Programme, which was published by the OGA in September 2016, and which allocated responsibilities and timescales for delivery of priorities set out in the Decommissioning Strategy

Established task groups to deliver on key initiatives around cost certainty and reduction, delivery capability models, regulatory guidance and industry engagement

Close linkage with trade associations such as Oil & Gas UK and Decom North Sea

# Supply Chain, Exports and Skills Board

The Supply Chain, Exports and Skills board works collaboratively with industry, government and trade bodies to promote and strengthen the capability of the oil and gas contracting community.

The UK service sector is in many ways the engine room of the UK domestic offshore oil and gas sector where the great majority of the jobs are found. The sector is also the key driving force behind many innovative process improvements and new technology advances.

The global decline in the oil price has undoubtedly brought particular challenges to some areas of the service sector. The reduction in drilling activity, and in particular, new field developments, has had a real impact. A key goal of the board has been to ensure that the UK service sector is competitive and well placed to take advantages of opportunities, whether now and into the future, across the whole field life cycle, both in the UK and internationally.

The Board made significant progress in 2016. The Supply Chain Strategy and associated Delivery Programme sets out a compelling, albeit challenging, vision for the service sector through to 2035 supporting both the ambition of MER UK as well as doubling the UK's share of the global market.

## 2016 Priorities

1.	Maximising economic potential from UKCS	Encourage a collaborative relationship between the operators and service sector
2.	Anchoring the service sector in the UK	Provide market information and confidence for investment in new technological enabling solutions
3.	Strengthen supply chain and exports	Promote the UKCS service sector and global exports working with BEIS, Oil & Gas UK, the Department for International Trade (DIT) and Scottish Enterprise

## Highlights

The Supply Chain Strategy and Delivery Programme published by the OGA in October 2016 sets out a vision for the service sector through to 2035. If the service sector builds on its global competitiveness and attracts the necessary investment, additional turnover of well over £200 billion can be generated over 20 years

Four Supply Chain Board workgroups were established: Exports, Skills, Promotion of the industry and Unlocking stranded investment

# Regional Development and Infrastructure

The Regional Development and Infrastructure (RDI) Board was established to deliver strategic and behavioural change to maximise value for the UKCS.

The joint OGA and industry task groups looking at West of Shetland gas evacuation and greater Fulmar Area potential provided some good insights into the potential of both areas, with the work finalised within the OGA.

Addressing collaboration was a key focus area of the RDI Board which supported the work undertaken by the Commercial Task Group with Deloitte and also provided insights and guidance into an OGA collaboration tool which was piloted by Chevron.

Finally, work was undertaken by Wood Mackenzie under the guidance of the RDI board to define critical infrastructure and work is also continuing in the area of infrastructure benchmarking.

The work that was initiated through the RDI board will now be taken forward by the OGA and therefore this board has been dissolved.

## 2016 Priorities

1. Prioritise regional reviews to mitigate risks and facilitate delivery of opportunities
2. Build on HM Treasury infrastructure workstream output to deliver an improved infrastructure access plan
3. Work with the Technology Leadership Board to reduce well costs and unlock value of discovered undeveloped resources

## Highlights

West of Shetland Task Group established to investigate gas export options. Preliminary evaluation work handed on to the OGA to complete

Fulmar Area Task Group established to investigate an optimal approach to maximise value for assets, developments and prospects in the area. Preliminary evaluation work handed on to the OGA to complete

The board provided resources and helped shape the development of the OGA collaboration tool which has been piloted and process established. This tool will provide an assessment of operator's collaborative behaviour and promote creation of an action plan to improve on the lowest ranked areas

Industry collaboration work group worked alongside the OGA and Oil & Gas UK to revise the Commercial Code of Practice (CCOP) which has been refreshed to reflect the obligations associated with the MER UK Strategy. To-date, 30 companies have registered their commitment to the refreshed CCOP

Worked with Deloitte on evaluating industry approach to collaboration and establishing standardised approaches around contracts and working practices

Review of critical infrastructure undertaken by Wood Mackenzie

Infrastructure benchmarking study initiated. Benchmarking is integral to the asset stewardship process and will stimulate performance improvement

# Efficiency Task Force

The Efficiency Task Force (ETF) is a catalyst and vehicle for pan-industry efficiency improvements and transformational change. This group aims to bring about significant cost savings to create a sustainable sector.

The need for efficiency improvements within the UK sector was recognised before the fall in the global oil price during 2014. No other basin in the world had seen such rapid cost inflation and the UKCS had become the most expensive province in which to operate. Action to address these fundamental issues was of critical importance.

Oil & Gas UK leads the Efficiency Task Force which aims to drive an industry-wide improvement in efficiency. There have been significant cost savings achieved to date. Average unit costs have fallen from £18 per barrel in 2014 to £12\* per barrel in 2016\*.

What is important is that these very welcome improvements are sustainable in the long-term, and this will be a key consideration of the work of the Board in the future.

## 2016 Priorities

1.	Business process	Improve everyday operations
2.	Standardisation	Develop simplified approaches and standardised solutions to deliver greater value
3.	Cultures, cooperation and behaviours	Change the way we work – together – to benefit the whole industry

## Highlights

### Business Processes

Optimised inventory management process development and Ampelius trading platform pilot has completed. There was significant platform activity (attracting 23 companies and 100,000 items). However workgroup trading occurred independently, albeit with significant cost savings. Lessons have been learned and alternative options, such as an inventory hub, are being considered. Oil & Gas UK's website will house workgroup inventories in the interim to facilitate ongoing trading

Good practice guideline for compression systems is being drafted for roll out in January 2017

Procurement tender process inefficiencies were identified and the Tender Efficiency Framework (TEF) was developed. Industry-wide implementation will commence following the TEF 'What will it take?' workshop in December with Oil & Gas UK Board member managing directors and service sector representatives

Potential savings from a regional cluster approach in the Mariner area are being analysed by the operator workgroup (Statoil, BP, TAQA, EnQuest, Maersk and Apache) the first phase of this project has now been completed. Clear potential for application of the approach to assets in production for planning and optimisation of vessel fleet were evident. Phase II of this project is now underway

### Standardisation

Multiple workgroups developed a theoretical approach to standardise subsea design, installation and analysis. Theoretical application of this to retrospective case studies revealed a significant savings potential. Application to a prospect case study (West Wick operated by Chevron) revealed a savings potential of 25%. The approach is now being applied to valves and significant savings are anticipated

### Cooperation, Culture and Behaviours

This underpins all of ETF's work and the enablers have been developed further. The Industry Behaviours Charter is referenced in the Asset Stewardship guidelines and Supply Chain Code of Practice. Case studies and efficiency challenges continue to be loaded onto the Rapid Efficiency Exchange (REE). The continuous improvement network is advancing work on training standardisation. The first continuous improvement seminar was well attended and received as was the first ETF roadshow with Petrofac

# MER UK Task Force 2017 Priorities

## Exploration

**Attracting Investment:** Promote inward investment and raise the profile of UK E&P to potential investors through international trade fairs and targeted approaches

**Deliver Future Activity:** Agree Yet-To-Find methodologies with industry, define the range of prospective resource potential, and ensure the UK exploration strategy will deliver appropriate drilling and stewardship programmes

**Licensing Rounds:** Support the OGA with 30<sup>th</sup> and 31<sup>st</sup> Licensing Rounds and ensure fit for purpose data packages of regional analysis and seismic are published

**Geophysical Technologies:** Encourage the adoption of new geophysical technologies and best practice. Support research and development activities including the application of data analytics, machine learning and AI techniques

## Asset Stewardship

**Base Management:** Build on PETF 'Plant and Export choke' efficiency improvements with 2017 focus on 'Reservoir and Well chokes' targeting use of seismic technology and well/ well-work opportunity management

**Integrity Management:** Work with the Health & Safety Executive to identify an asset integrity initiative which would benefit from Taskforce support

**Transfer Learnings:** Identify asset stewardship learnings from the nuclear industry and mechanisms to share in oil and gas sector

**Monitor 2016 Priorities:** Existing production efficiency, project optimisation and EOR taskforce product delivery

## Decommissioning

**Cost Certainty and Reduction:** Establish a demonstrable cost estimate range for UKCS decommissioning and identify cost reduction opportunities, through consistent estimating methodologies and structure, operator engagement and publishing of cost metrics and benchmarks

**Regulatory Guidance:** Working with BEIS Offshore Decommissioning Unit and HSE, enhance industry understanding of current policies, legislation, and related guidance, and sharing of examples of good practice of cost effective compliance

**Delivery Capability:** Define and demonstrate the benefit of optimised execution and collaboration models based on recognised supply and demand profiles. Create radical business models and stimulate greater efficiency while appropriately allocating liability, risk and reward

Technology	<p><b>Working Together:</b> Work with the OGA, the UKCS industry and technology organisations, including OGTC, to ensure progress of “priority themes” from R&amp;D to field deployment</p>
	<p><b>Established Priority Themes:</b> Oversee plans and progress made by various delivery organisations in the areas of well cost, unsanctioned discoveries, and asset integrity</p>
	<p><b>Emerging Priorities:</b> Define priority scope, business cases and level-1 plans for big data analytics and decommissioning</p>
Supply Chain	<p><b>Exports:</b> Identify and promote accessible global opportunities and work with Government Departments and Trade Associations to assist UK companies increase their international footprint</p>
	<p><b>Promotion:</b> To develop a comprehensive online service sector hub to promote UK service sector capability across all areas including decommissioning</p>
	<p><b>New Opportunities:</b> Providing a focus on Increasing Exploration, maintaining OPEX spend at a sustainable level, focussing on decommissioning opportunities, and seeking innovative solutions to unlock stranded investment</p>
	<p><b>Skills:</b> Retain and develop UK service sector capability. This will be pursued through a close link with OPITO, relevant skills bodies &amp; Government departments</p>
Cost and Efficiency	<p><b>Promote:</b> A collaborative and knowledge-sharing business culture through workforce involvement and between companies to unlock value and to reduce unit operating cost</p>
	<p><b>Communicate:</b> Industry’s ‘efficiency’ success, uptake of ETF tools and their impact to a wide range of stakeholders using a range of media to encourage a sustainable reduction in unit operating costs</p>
	<p><b>Simplify:</b> Commodity equipment specifications (e.g. Valves) to reduce over-specification and associated costs</p>
	<p><b>Improve:</b> Procurement and tendering processes to create value and to reduce costs</p>
	<p><b>Understand:</b> The opportunity and then promote efficiency in the field of industry-wide logistics to reduce associated costs</p>

## OGA London Office

4th Floor  
21 Bloomsbury Street  
London  
WC1B 3HF

## OGA Headquarters

AB1 Building  
48 Huntly Street  
Aberdeen  
AB10 1SH



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Oil and Gas Authority is a limited company registered in England and Wales with registered number 09666504 and VAT registered number 249433979. Our registered office is at 21 Bloomsbury Street, London, United Kingdom, WC1B 3HF

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