



Oil & Gas
Authority

Requirements for the planning of and consent to UKCS Field Developments

Contents

1. Introduction	4
Scope and purpose of the document	4
FDP Approval road map	5
Governance	6
Scalability of the process	6
Charging	7
2. MER UK Strategy	8
Stewardship Expectations	9
Ensuring third party access to offshore infrastructure	9
3. Considerations relevant to all new field developments	10
Robust Project Delivery (SE-05)	10
Environmental Impact and Health and Safety assessments	10
Decommissioning	11
Unitisation and co-operative development	11
Transboundary fields	11
Flexible approach to development proposals	11
i. Extended Well Tests	11
ii. Phased developments	11
iii. Satellite tie-back development	12
Considerations of Good Oilfield Practice	12
Gas utilisation/flaring	12
Measurement of petroleum	12
Financial Criteria	12
4. Assessment Phase requirements	13
Concept Select	13
Economic Evaluation	14
Consultation on Supply Chain Action Plan (SCAP)	15
Consultation on Project Execution Plan (PEP)	15
Technology and EOR screening	16
Environmental Statement (ES) preparation	16

5. Authorisation Phase requirements	17
Economic Evaluation	17
Supply Chain Action Plan	17
Project Execution plan	19
Field Determinations	19
Development Area	19
Unitisation and Unit Operating Agreements (UJOA)	19
Field Operator approval	19
Host facility modifications	20
Environmental statement consultation	20
Design Notification	20
Decommissioning security arrangements	21
Consent to the FDP	21
Time frame	21
Content of the FDP	22
Development and Production Consent	22
6. Execute Phase requirements	23
Monitor project execution	23
Commissioning flare consents issued	24
Pipeline Works Authorisations	24
Safety case accepted by OSDR	24
Divergence from the agreed FDP	24
7. Regulation following FDP authorisation	25
Required future Consents	25
Reporting	25
Changes of Licensee and/or Field Operator	25
Appendix A: Guidelines for the content of an FDP document	26
Appendix B: Roles and responsibilities	27

1. Introduction

1. The development of, and production from, oil and gas fields in the United Kingdom's territorial waters and on the United Kingdom Continental Shelf ('**UKCS**') is subject to a licensing regime overseen by the Oil and Gas Authority ('**OGA**'). Under the model clauses applicable to a seaward production licence, licensees require the OGA's consent to erect or carry out permanent works for the purpose of getting or conveying petroleum from a licensed area or to get petroleum from such an area. Such consent is referred to as a 'Development and Production Consent'.
2. The document submitted in support of an application by a licensee for authorisation to proceed with a proposed development is referred to as a Field Development Plan ('**FDP**'). The FDP is the pre-requisite for the OGA's development and production considerations and should provide a description of the technical and economic information on which the development is based.
3. When considering whether to consent to an FDP, the OGA will, amongst other things, assess whether the proposed project accords with the obligations set out in the strategy for enabling the principal objective of maximising the economic recovery of UK petroleum ('**MER UK Strategy**'), and whether the development methods proposed comply with good oilfield practice.

Scope and purpose of the document

4. This document is intended to assist those involved in the planning of a new field development and subsequent consent to an FDP leading to production of first hydrocarbons. The guidance covers the following:
 - An overview of the OGA's objectives and considerations relevant to all new field developments
 - The Assessment Phase leading to the Concept Select
 - The Authorisation Phase leading to the consent to a Field Development Plan
 - The Execute Phase leading to the production of hydrocarbons
 - The process for revising a previously consented-to FDP (i.e. an FDP Addendum ('**FDPA**'))
5. This guidance is not a substitute for any regulation or law and is not legal advice. It does not have binding legal effect. Where the OGA departs from the approach set out in this guidance, the OGA will endeavour to explain this in writing to the person seeking a decision from the OGA.

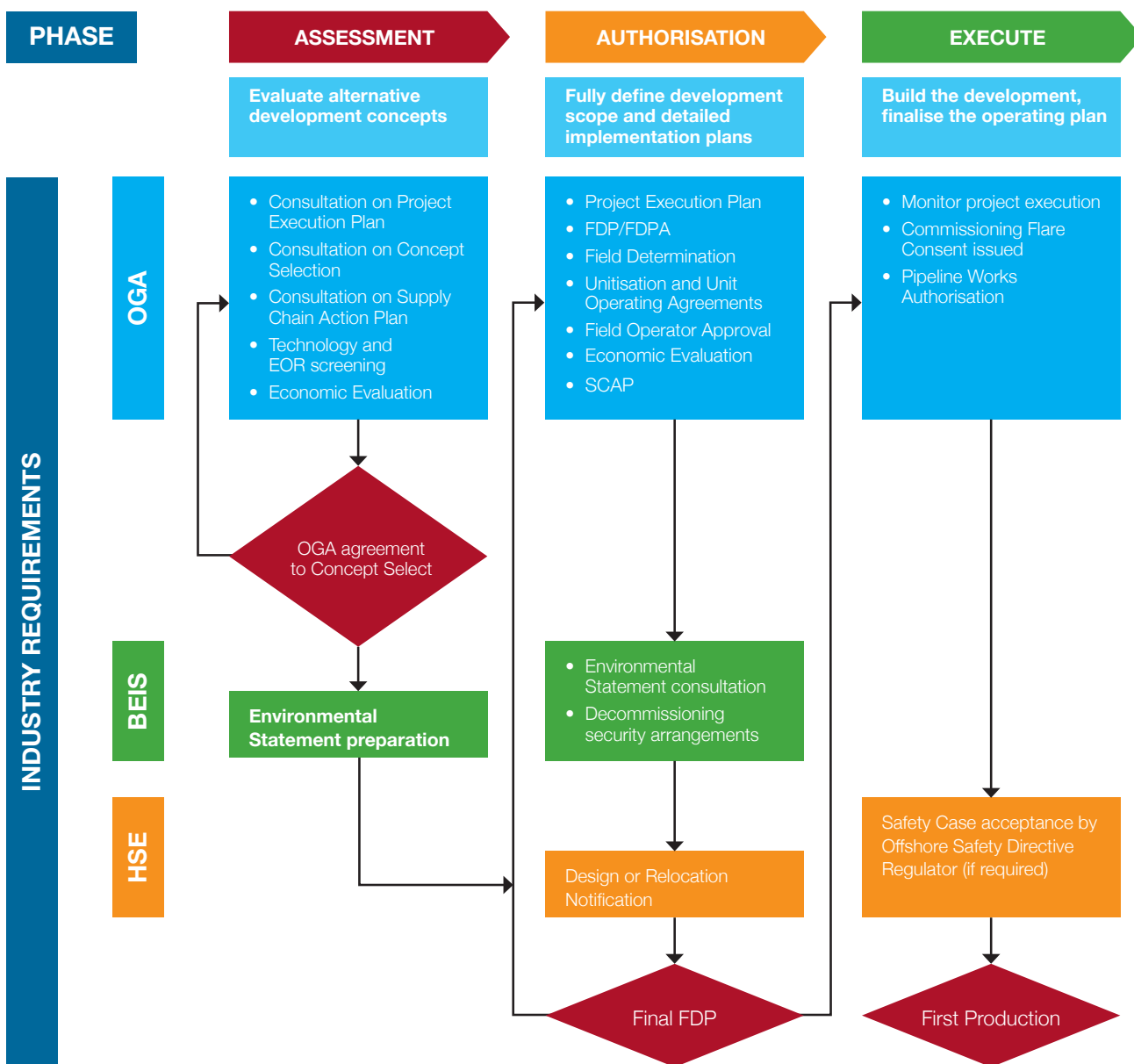
FDP Approval road map

- 6. The “road map” below sets out the three main stages of the OGA’s field development process and the main requirements of each stage.

The OGA encourages the Field Operator, appointed on behalf of the Licensees to undertake the development and operate the field, to engage with the OGA early and frequently in the planning of a proposed field development, initially to discuss development options and, subsequently, the content of the FDP prior to its submission. The OGA will appoint a single point of contact for all discussions relating to the FDP.

- 7. The OGA will review the Field Operator’s development options and subsequently the FDP. Where issues are identified, the OGA will undertake a detailed examination of the Field Operator’s decisions which may, amongst other matters, include the review of the technical and economic basis for the development. The Field Operator will be expected to provide the necessary justification of such plans or amend the FDP as appropriate.

Figure 1: New Field Development Road Map



8. Assessment Phase leading to the Concept Select

The Field Operator should engage with the OGA early in the Assessment Phase. The Assessment Phase is an early project phase that the OGA considers extremely important in the development of a new field. This is where decisions are expected to be taken by the Licensees on the strategies and project concepts that will set out how the Licensees will take the steps necessary to secure that the maximum value of economically recoverable petroleum is recovered from the new field(s). In this project phase, the Licensees should evaluate alternative development strategies and identify a preferred development concept. In this guidance the OGA refers to this decision as “Concept Select”.

Once a decision has been made on the development concept, the Field Operator should provide a Concept Select report to the OGA that summarises the information and requirements which led to the proposed development concept. The conclusion of the Assessment Phase will be the agreement with the OGA on the Concept Select decision. In addition, early engagement with the OGA on the requirements of the Supply Chain Action Plan should be undertaken prior to the Concept Select decision.

9. Authorisation Phase leading to the consent to a Field Development Plan

The Authorisation Phase of a project is where the Concept Select is matured to secure all relevant Licensee and regulatory approvals. The Authorisation Phase should deliver a technical definition and a Project Execution Plan (PEP) to ensure a robust project is developed with clear scope, cost estimate, schedule and commercial terms.

During this Phase, the Field Operator should share an early version of the FDP with the OGA. As the development decisions mature, the Field Operator should submit the finalised FDP which should include a detailed account of the development and the principles and objectives which will govern its implementation throughout the full lifecycle of the project. The result of this phase may be a decision by the licensees to invest in the project (“Final Investment Decision” or “FID”) and consent to the FDP from the OGA.

If the guidance in this document is followed, the FDP prepared towards the end of the Authorisation Phase will normally require only minor revisions to reach its final form.

The OGA expects that, where Licensees have followed the process set out in this document, a Development and Production Consent would normally be issued by the OGA within one month of submission of the final FDP document.

10. Execute Phase leading to the production of hydrocarbons

The Execute Phase of a project is where the project scope defined in the FDP and Project Execution Plan will be implemented by the Field Operator. At this stage all Licensees who are party to the development are committed to the project and a Development and Production Consent has been given to proceed by the OGA. The purpose of the Execute Phase is to carry out all required activities (e.g. well construction, engineering, procurement, construction, commissioning/start-up etc) and to deliver the project objectives safely.

Governance

11. The FDP should represent a single view of the project by the Licensees, who are jointly and severally liable for the content and implementation of the FDP. One Licensee is appointed as a Field Operator to be responsible for the preparation of the FDP and to ensure that all necessary consents and authorisations are obtained, and for the execution of the project. It is usual for the OGA to conduct discussions with the Field Operator as the representative of all the Licensees. The OGA has published guidance¹ on how to apply for OGA approval to become a Field Operator.

Scalability of the process

12. The elements in the new field development road map and the project phases described above are intended to guide industry to an efficient and timely field development. It is recognised that for smaller projects (for example a subsea tie back into existing production facilities), some elements of the road map can be simplified, however all elements of the approval road map are applicable.

At an early stage, the Field Operator should discuss with the OGA its requirements for the FDP and the Development and Production Consent. The Field Operator should also discuss with the Department for Business, Energy and Industrial Strategy (BEIS) its requirements for an Environmental Impact Assessment (EIA) and an Environmental Statement (ES) and with the Offshore Safety Directive Regulator (“OSDR”)² its requirements under the Offshore Safety Directive.

¹ <https://www.ogauthority.co.uk/exploration-production/production/field-operatorship/>

² <http://www.hse.gov.uk/osdr/index.htm>

Table 1: Application of guidance by project types

Type	Overview
New Field Development (Greenfield)	<ul style="list-style-type: none"> • This guidance applies
Host Facilities (Brownfield)	<ul style="list-style-type: none"> • This guidance applies
Field Re-Development	<ul style="list-style-type: none"> • This guidance applies
Extended Well Test	<ul style="list-style-type: none"> • Letter to OGA required setting out proposed timeline and objectives • See the OGA website for further information
Phased Development	<ul style="list-style-type: none"> • This guidance applies • The FDP will cover the initial phase of development
Satellite Tie Back	<ul style="list-style-type: none"> • This guidance applies • FDP can be scaled according to size and complexity

Charging

- 13.** The OGA provides a range of services to licence holders and charges are made for the review of and consent to an FDP (referred to in the relevant regulations as a ‘development and production programme’), including consent to FDP addenda. Further details of these charges can be found in the OGA’s guidance on fees.³

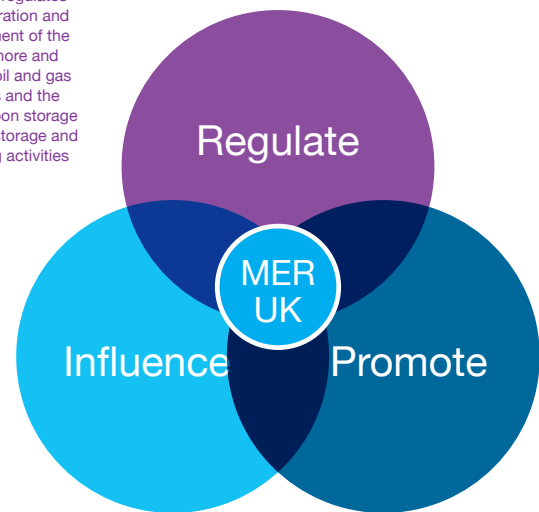
³<https://www.ogauthority.co.uk/media/3566/guidance-note-on-ogas-fees-and-charges-regime.pdf>

2. MER UK Strategy

- 14.** The MER UK Strategy⁴ came into force on 18 March 2016. Its Central Obligation states that *“relevant persons must take the steps necessary to secure that the maximum value of economically recoverable petroleum is recovered from the strata beneath UK waters.”* The Central Obligation is binding on relevant persons and the OGA. To assist with its effective delivery the MER UK Strategy also sets out several Supporting Obligations, Required Actions and Behaviours. These expand on how the Central Obligation applies in particular circumstances and specify the actions and behaviours to be adopted by relevant persons when carrying out activities in the UKCS. The MER UK Strategy also contains a number of safeguards; the Central and Supporting Obligations, Required Actions and Behaviours should be read subject to those safeguards.
- 15.** When considering whether to consent to a proposed field development, the OGA will evaluate whether the proposed project supports the MER UK Strategy.
- 16.** The OGA will work with Licensees to ensure that the development option agreed is that which is most likely to secure the maximum value of economically recoverable petroleum from the strata beneath UK waters.

OGA role

The OGA regulates the exploration and development of the UK's offshore and onshore oil and gas resources and the UK's carbon storage and gas storage and offloading activities



The OGA has a critical role to influence and encourage a culture of greater collaboration on the UKCS, improve commercial behaviours, and help enable a more efficient industry

The OGA has an important role to promote investment in the UKCS, create value in the UK through exports and develop the prosperity of the industry including wider supply chain

⁴ <https://www.ogauthority.co.uk/regulatory-framework/mer-uk-strategy/>

Stewardship Expectations

17. In consultation with the industry, the OGA has developed stewardship expectations⁵ for Field Operators and Licensees across the oil and gas lifecycle, including SE-05 (Robust Project Delivery). These good practice expectations are aligned with the MER UK Strategy Supporting Obligations and are designed to help achieve consistent stewardship performance.
18. An implementation guide supports each Stewardship Expectation. These provide further details to assist Field Operators and Licensees in achieving them and includes the rationale, the expected outcomes and a description of key elements or behaviours required to meet the OGA's expectations.
19. During the Assessment Phase, good practice will normally require that the information needed to determine the most appropriate development option has been gathered and analysed properly. This option will allow all realistic options for the field and area, including the application of Improved Oil Recovery ('IOR'), Enhanced Oil Recovery ('EOR') techniques, and new or innovative technology, to be considered properly. Field Operators should refer to the OGA Stewardship Expectations SE-02 (Exploration and Appraisal Subsurface Work Programme) and SE-03 (Optimum Use of Subsurface Data) for further information.
20. Licensees are expected to bring forward field development proposals in a timely manner, consistent with the relevant Stewardship Expectations referred to above. FDPs should be submitted for consent within the time scales set out in the terms of the licence.

Ensuring third party access to offshore infrastructure

21. When reviewing new field development proposals which have implications for future infrastructure utilisation the OGA will evaluate if the proposals support the MER UK Strategy, which may include such considerations as, but is not limited to:
 - Avoiding the unnecessary proliferation of oil and gas pipelines
 - Aiding, where feasible, future field developments, including those outside the licence area
22. Subject to the above, the evacuation route and destination of petroleum are essentially matters for the commercial judgement of the Licensees. Where oil or gas is to be exported to another country by means of a new pipeline, the pipeline will be subject to the negotiation of appropriate agreements between the governments concerned.
23. A voluntary industry Offshore Infrastructure Code of Practice⁶ seeks to simplify the timely application of the processes of seeking, offering and negotiating third party access to offshore pipelines and processing facilities and onshore terminals and ensure that access is easy and fair, with terms offered on a negotiated, non-discriminatory basis.
24. The OGA has powers, having considered the interests of all parties, to impose a solution to problems with access to pipelines and processing facilities and onshore terminals. The OGA has published separate guidance on disputes over third party access to upstream oil and gas infrastructure⁷ which describes how these powers are used.
25. The OGA also has powers, if required, to direct the size and or routing of a new pipeline, through the Pipeline Works Authorisation process.

⁵ <https://www.ogauthority.co.uk/exploration-production/asset-stewardship/expectations/>

⁶ <https://oilandgasuk.co.uk/infrastructure-code-of-practice-2.cfm>

⁷ <https://www.ogauthority.co.uk/regulatory-framework/powers-sanctions-guidance/third-party-access/>

3. Considerations relevant to all new field developments

Robust Project Delivery (SE-05)

26. Licensees and Field Operators should be familiar with the Stewardship Expectation implementation guides relevant to field developments, in particular SE-05⁸ (Robust Project Delivery).

This implementation guide provides direction to promote good project delivery:

- Ensure accountable leadership, a project delivery organisation and governance are in place
- Ensure that an established project management system is in place and used
- Ensure sufficient front-end preparation and benchmarking has been completed prior to project sanction
- Ensure a Project Execution Plan (PEP) is developed and updated at each phase of the project

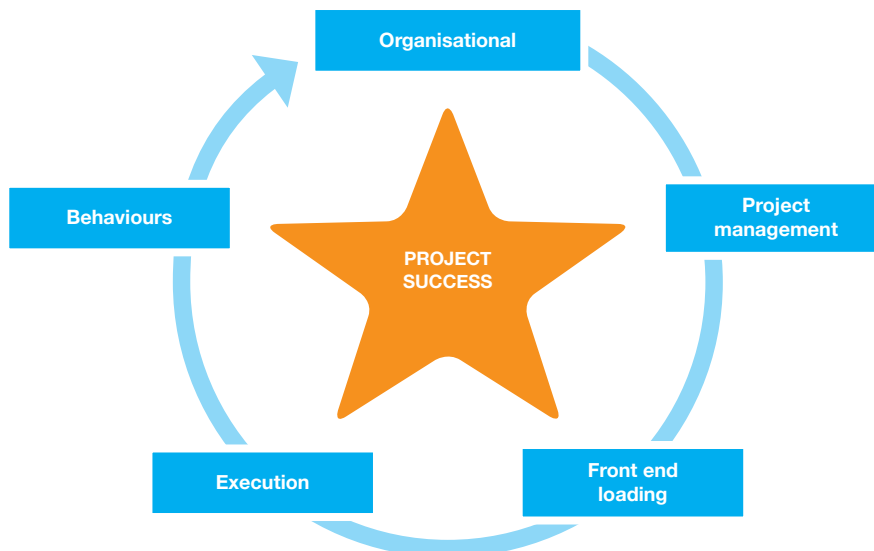
The OGA has published a lessons learned report from UKCS oil and gas projects 2011–2016.⁹

Environmental Impact and Health and Safety assessments

27. The environmental regulation of offshore oil and gas activity is the responsibility of the Offshore Petroleum Regulator for Environment and Decommissioning ('**OPRED**'), part of the UK government's Department for Business, Energy and Industrial Strategy (BEIS). An Environmental Statement ('**ES**') describing the Environmental Impact Assessment ('**EIA**') is required to be submitted to BEIS as part of the FDP authorisation process. More information can be found on BEIS's environmental legislation page.¹⁰

28. Safety regulation is the responsibility of the Offshore Safety Directive Regulator ('**OSDR**'), the Health and Safety Executive ('**HSE**') Energy Division and OPRED working together as the Competent Authority to implement the requirements of the EU Offshore Safety Directive and other statutory provisions on the safety of offshore oil and gas operations.

Figure 2: Lessons Learned – 5 Key Areas



⁸ <https://www.ogaauthority.co.uk/media/3828/se-05.pdf>

⁹ <https://www.ogaauthority.co.uk/news-publications/publications/2017/lessons-learned-from-ukcs-oil-and-gas-projects-2011-2016/>

¹⁰ <https://www.gov.uk/guidance/oil-and-gas-offshore-environmental-legislation>

29. Operators must submit a Design Notification to the OSDR at an early stage in the design process for field developments involving new installations¹¹. The design notification must be followed by submission of a safety case, for the OSDR's acceptance, before the installation can be operated.
30. The OSDR will require a Relocation Notification if a production installation, with an existing safety case, is to be moved to a new location in external waters or if a non-production installation is to be converted to a production installation.
31. Licensees are advised to contact the OSDR at an early stage in their development planning, ie during the Assessment Phase.

Decommissioning

32. In accordance with the UK's international obligations, all installations emplaced on or after 9 February 1999 must be designed to be completely removed to shore for reuse, recycling or final disposal on land.

Unitisation and co-operative development

33. Where a field determination extends across more than one licence, the OGA may require Licensees to enter into a Unitisation and Unit Operating Agreement ('**UUOA**') prior to submitting an FDP. This UUOA needs to be approved by the OGA prior to FDP consent.

Transboundary fields

34. The development and operation of transboundary fields¹² extending beyond the limits of the UKCS, or fields wholly on another continental shelf which require the development of new transboundary pipeline infrastructure or wells and control facilities, will require a formal agreement between the states concerned.
35. The matters to be addressed in any such inter-governmental negotiations are likely to vary from project to project. Licensees are advised to seek early guidance from the OGA during the Assessment Phase for any development proposal that may have transboundary implications. The authorisation time-scale for transboundary fields will depend on the level of agreement needed between the governments concerned.
36. The OSDR should be engaged at an early stage to gain understanding of which regulatory regime will apply.

Flexible approach to development proposals

37. For most offshore fields, it is expected that Licensees will put forward a plan covering the lifecycle of the development. The OGA recognises that there may be valid reasons for more gradual or flexible approaches to some developments stemming from geological or engineering uncertainty, infrastructure constraints or the benefits of phasing expenditure. The OGA will support such approaches where consistent with the fulfilment of the principal objective of MER UK. The alternatives to full lifecycle developments that are commonly proposed, and the criteria for their consideration by the OGA, are set out below.

i. Extended Well Tests (EWTs)

38. The OGA may consent to extended periods of test production from exploration or appraisal wells prior to field development authorisation. An EWT consent requires an application by the Field Operator to the OGA setting out the timetable and objectives of the test and the quantities of oil and gas to be produced, saved or flared.
39. The application should demonstrate that the primary objective of the EWT is to obtain essential field information to improve technical understanding or confidence in the performance of the field to advance towards a development. The EWT should not be prejudicial to ultimate recovery of a future development. EWTs are not an alternative to production under a consented-to FDP. Additional guidance on EWTs can be obtained by contacting the OGA directly.
40. An Environment Impact Assessment is required to be submitted to BEIS to support the EWT application. Field Operators may request a direction from BEIS confirming that a full Environmental Statement (ES) is not required. Further guidance can be found in the Guidance Notes on the Petroleum Production and Pipelines (Assessment of Environmental Effects) Regulations 1999 (as amended).¹³

ii. Phased developments

41. For fields which do not appear to have the economic potential to sustain further appraisal, or where the best development method cannot be determined without substantial production experience, or to commence early production, the OGA may accept a proposal for the phased development of a field. The form of the later phases will be dependent on the results of the earlier ones. Licensees will be expected to demonstrate that this phasing is not detrimental to the MER UK Strategy.

¹¹ <http://www.hse.gov.uk/pubns/books/l154.htm>

¹² <https://www.ogauthority.co.uk/exploration-production/development/transboundary-fields/>

¹³ <https://www.gov.uk/oil-and-gas-offshore-environmental-legislation>

- 42.** Licensees must submit an FDP for the initial phase of the project. The submission can be scaled in accordance with the phased nature of the proposed development plan and should include:
- the more likely forms of subsequent phases
 - the criteria which will need to be met to move to development of the subsequent phases
 - the time frame proposed for further appraisal or development.

iii. Satellite tie-back development

- 43.** In cases where a satellite field development is to be tied back to existing host facilities with different ownership, it is important that the Field Operator of the satellite development and the operator of the host facility collaborate to ensure an agreed plan for any necessary modification to the host facility and associated safety case management.
- 44.** The OGA will require a letter of support from the host facility operator, on behalf of all its co-venturers.

Considerations of Good Oilfield Practice

- 45.** The licence model clauses require that the Licensee(s) shall execute all operations in or in connection with the licensed area in a proper and workmanlike manner in accordance with methods and practice customarily used in good oilfield practice.
- 46.** The OGA considers that good oilfield practice relates largely to technical matters within the disciplines of geology and reservoir engineering, petroleum engineering and facilities engineering and to the impact of the development on the environment.
- 47.** Practices that are harmful to future oil or gas recovery including the wasteful flaring of gas, or which conflict with the interests of other potential users of the licensed area, should be avoided at all stages of field development.
- 48.** Licensees should ensure that they follow good oil field practice when proposing plans for the development and management of a field.

Gas utilisation/flaring

- 49.** For new field developments, the OGA expects that where, over the life of the field, the value of the produced gas is higher than the costs of bringing it to the market, Licensees will make provision to do so.
- The Licensees should consider carefully all options for gas handling. These may include its processing and transportation to shore, use as fuel, as a means for improving oil recovery, for sale to another development, conversion to other fuels (including electricity), injection for disposal, or, as a last resort, flaring.
- 50.** In considering which option should be selected, the OGA will, amongst other things, consider the expected overall costs and benefit to the UK (in accordance with the provisions of the MER UK Strategy), which may not always reflect the commercial positions of individual Licensees. The OGA encourages both infrastructure owners and users to adopt the principles of the industry's voluntary Offshore Infrastructure Code of Practice when examining the options for transporting gas to market.
- 51.** Where gas is to be disposed of by flaring, a detailed technical and economic assessment should be provided to the OGA to justify the selection of this option. The Licensees' full consideration should be given in the design of the facility to providing for less wasteful alternatives should the economic or technical circumstances change.

Measurement of petroleum

- 52.** Licensees are required under the licence model clauses to measure petroleum using methods customarily used in good oilfield practice and approved by the OGA. Petroleum Operations Notice (PON) 6¹⁴ sets out the procedure that Licensees should follow to gain the OGA's approval of their methods for petroleum measurement.

Financial Criteria

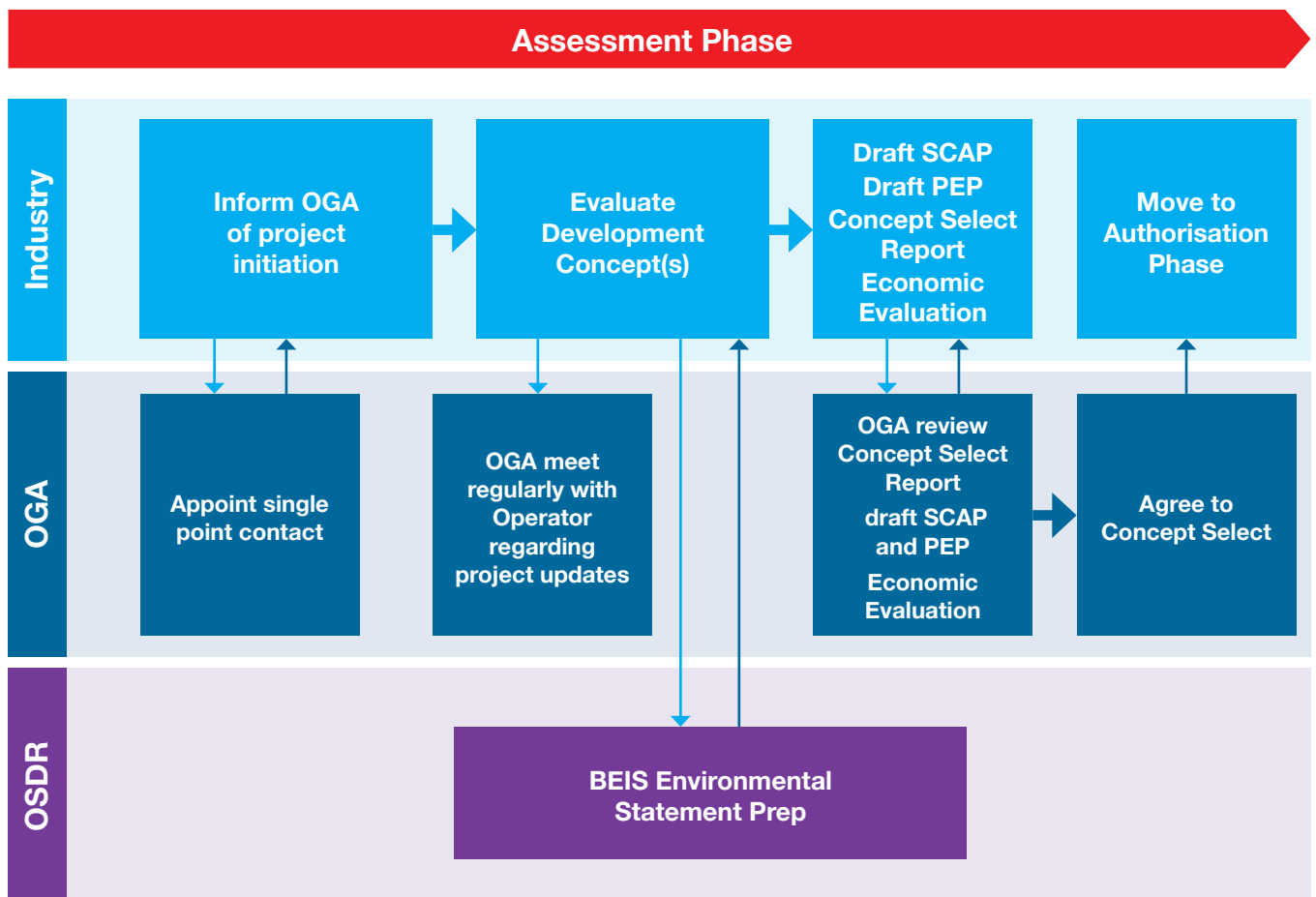
- 53.** The OGA has issued guidance¹⁵ on financial criteria for Licensees. The measures described in the OGA's financial guidance set out how the OGA will assess whether the Licensees have the financial viability and capacity to undertake the commitments set out in the proposed FDP.

¹⁴ <https://www.ogauthority.co.uk/exploration-production/petroleum-operations-notices/pon-6/>

¹⁵ <https://www.ogauthority.co.uk/licensing-consents/licensing-system/licensee-criteria/>

4. Assessment Phase requirements

Figure 3: Assessment Phase



54. During the Assessment Phase Licensees should provide the OGA with sufficient opportunity and information to gain an understanding of the field and its conceptual development. The conclusion of the Assessment Phase will be the agreement with the OGA on the Concept Select decision including the considerations set out below.

Concept Select

55. The OGA attaches great importance to the Assessment Phase and the Concept Select as it is at this stage the Licensees will be making decisions that are likely to have the most significant implications for their MER UK Strategy obligations. In addition, a Field Operator's project planning process generally benefits if intermediate decisions can be made on the project before final commitment is made to the FDP.

56. The OGA requires to be consulted on the development plan options so that aspects requiring detailed consideration by the OGA can be identified. Such consideration should include economic evaluation of the development options, with the requirements for operators outlined further below.
57. The Field Operator should prepare and submit to the OGA a Concept Select report once the development plan option has been selected. The OGA will review and thereafter confirm whether it agrees with the proposed form of the development.
58. Once the Field Operator has provided the OGA with the Concept Select report, including sufficient opportunity and information to gain an understanding of the field and its conceptual development, the OGA will review the report and notify the Field Operator of any aspects of the development which are not aligned with the MER UK Strategy or any other issues to be addressed. If any such issues are identified the OGA will seek to agree a programme of work or review, intended to lead to their resolution within an agreed timetable.
59. In addition, the OGA should be informed about certain relevant meetings between joint venture partners in accordance with the OGA's statutory notice¹⁶ on meetings issued pursuant to the OGA's powers under the Energy Act 2016. Such meetings include Operational Committee meetings ('OCM') and Technical Committee meetings ('TCM') for specified assets or major project review meetings for projects with capital costs of over £300 million. The OGA has the right to attend such meetings as well as be provided with a written summary.
60. Agreement with the OGA on the Concept Select is required to ensure the OGA's support moving forward with the Authorisation Phase. However, agreement to the Concept Select does not necessarily mean that the final version of the submitted FDP will be consented to.

Economic Evaluation

61. The OGA considers the economics of field and incremental developments as part of the assessment of FDPs/FDPAs. It is therefore essential that the Field Operator includes details of the project economics – including the various development options being considered – within the Concept Select report and submits data to the OGA in the Standard Economics Template¹⁷ (SET) format.
62. Where the development plan for a new field or incremental development has a significant impact on an already consented-to field(s), relevant data for the affected field(s) should also be provided to capture the impact of the development on the principal objective of MER UK.
63. MER UK is achieved when a development maximises the net present value (NPV) of economically recoverable petroleum from the UKCS, taking into account the effect on recovery from other fields and the impact on infrastructure. This is irrespective of the division of realised value between the Licensees and the Exchequer. In ranking options in terms of their impact on MER UK, the OGA will focus on pre-tax NPVs calculated using an appropriate discount rate (currently, 10 per cent real). The OGA does not consider that unavoidable costs such as capital repayment and the costs of financing are true costs of production and they should, therefore, not be considered in pre-tax cash flows or the definition of the economic limit for cessation of production.
64. Where the leasing of an asset is being considered, Licensees should work with the potential lessor(s) to reach a contractual agreement which will get as close to the theoretical economic limit as practicable, considering the need of the Licensees to manage the risk of the project. The OGA is willing to work closely with the Field Operator to identify these risks and encourage the development of appropriate contractual frameworks which can take account of information gained during production.

¹⁶ <https://www.ogauthority.co.uk/media/4220/meetings-statutory-notice-2017.pdf>

¹⁷ <https://www.ogauthority.co.uk/media/5084/update-to-set-2018.xlsx>

Consultation on Supply Chain Action Plan (SCAP)

65. In 2018, the OGA introduced new measures to ensure Field Operators work appropriately with the supply chain and derive maximum value from project activity. The purpose of a SCAP¹⁸ is to assist operators in demonstrating their contract strategies and concepts are comprehensive and well-positioned to deliver 'best value' in accordance with their FDP.
66. The OGA expects all projects requiring an FDP to develop a SCAP. In the Assessment Phase, the Field Operator should prepare a draft SCAP prior to Concept Select and share with the OGA for informal review and discussion. This should be at an early stage of the project, in advance of any project specific contract award.
67. Following the OGA's initial review, any incomplete or unsatisfactory SCAPs will be returned with comments/clarifications to be addressed. The Field Operator can amend the SCAP during the later Authorisation Phase following feedback from the OGA or the Field Operator's internal review. The SCAP is non-prescriptive with no template, therefore simple guidance notes are set out in the SCAP criteria and expectations.
68. There is also an expectation that Field Operators will extend the SCAP commitment to first tier contractors where individual contracts specific to the project exceed a value of £25 million.
69. It is anticipated that SCAPs will be developed as an ongoing process in tandem with the field development planning.

Consultation on Project Execution Plan (PEP)

70. The Field Operator should prepare a PEP for all stages of the project. In the Assessment Phase, the PEP should be developed in parallel to the FDP and should be recompiled and updated at each stage of the project.
71. The PEP should include sections comprising:
 - Schedule
 - Project organisation
 - Contracting strategy (reference the Supply Chain Action Plan)
 - Cost estimate
 - Risk and opportunity management
72. Further guidance can be found in Stewardship Expectation SE-05 (Robust Project Delivery).¹⁹

¹⁸ <https://www.ogauthority.co.uk/news-publications/publications/2017/supply-chain-action-plans-guidance/>

¹⁹ <https://www.ogauthority.co.uk/media/3828/se-05.pdf>

Technology and EOR screening

- 73.** Field Operators should demonstrate that both existing and new and emerging technologies have been considered for deployment to their optimum effect to maximise the value of economically recoverable petroleum from the field development through its full lifecycle. Field Operators should refer to the OGA's Technology Strategy and Stewardship Expectation SE-08 (Technology Plan).²⁰
- 74.** Depending on their relevance to each project/development, the OGA expects the Field Operator to:
- Undertake early engagement with the OGA (at the start of the Assessment Phase) on technology deployment prior to submission of FDPs
 - Conduct Improved Oil Recovery ('**IOR**') and Enhanced Oil Recovery ('**EOR**') screening (as necessary), including the development of any necessary technologies
 - Refer to the OGA's EOR Strategy²¹
- 75.** In the Assessment Phase for all oil or condensate reservoir developments, the potential for application of improved recovery processes beyond conventional methods should be evaluated. A summary of all the recovery processes considered and the reasons for the final choice is required in the concept select report. Field Operators are required to justify if EOR processes are not being used or are not planned to be utilised.
- 76.** Where a development demonstrates economic potential for EOR, Licensees should set out their firm plans to implement this. Where definite conclusions cannot be reached, a programme for addressing the outstanding issues during production should be given in the FDP and for ensuring that both wells and production facilities are EOR-ready or can be readily made so.
- 77.** A summary of applicable technologies considered should be included in the Concept Select report. Appropriate technology should be identified at the Concept Select stage and discussed in the Concept Select report. The report should identify what technologies were considered and the reason for being proposed or discounted should be provided. The likely benefits these technologies could potentially provide to the development should be stated as well as any risks associated with their deployment. Reasons for the final technology solution should be included in the report. Technologies should cover the full life cycle of the development.

Environmental Statement (ES) preparation

- 78.** An Environmental Statement ('**ES**') describing the Environmental Impact Assessment (EIA) is required to be submitted to BEIS as part of the FDP authorisation process.

The Environmental Impact Assessment process should begin in the Assessment Phase before Concept Select and the choice of development concept must be made giving full weight to any environmental concerns.

- 79.** See BEIS guidance²² for further information on the preparation and submission of an ES. The timescale for the approval of an ES may vary from project to project.

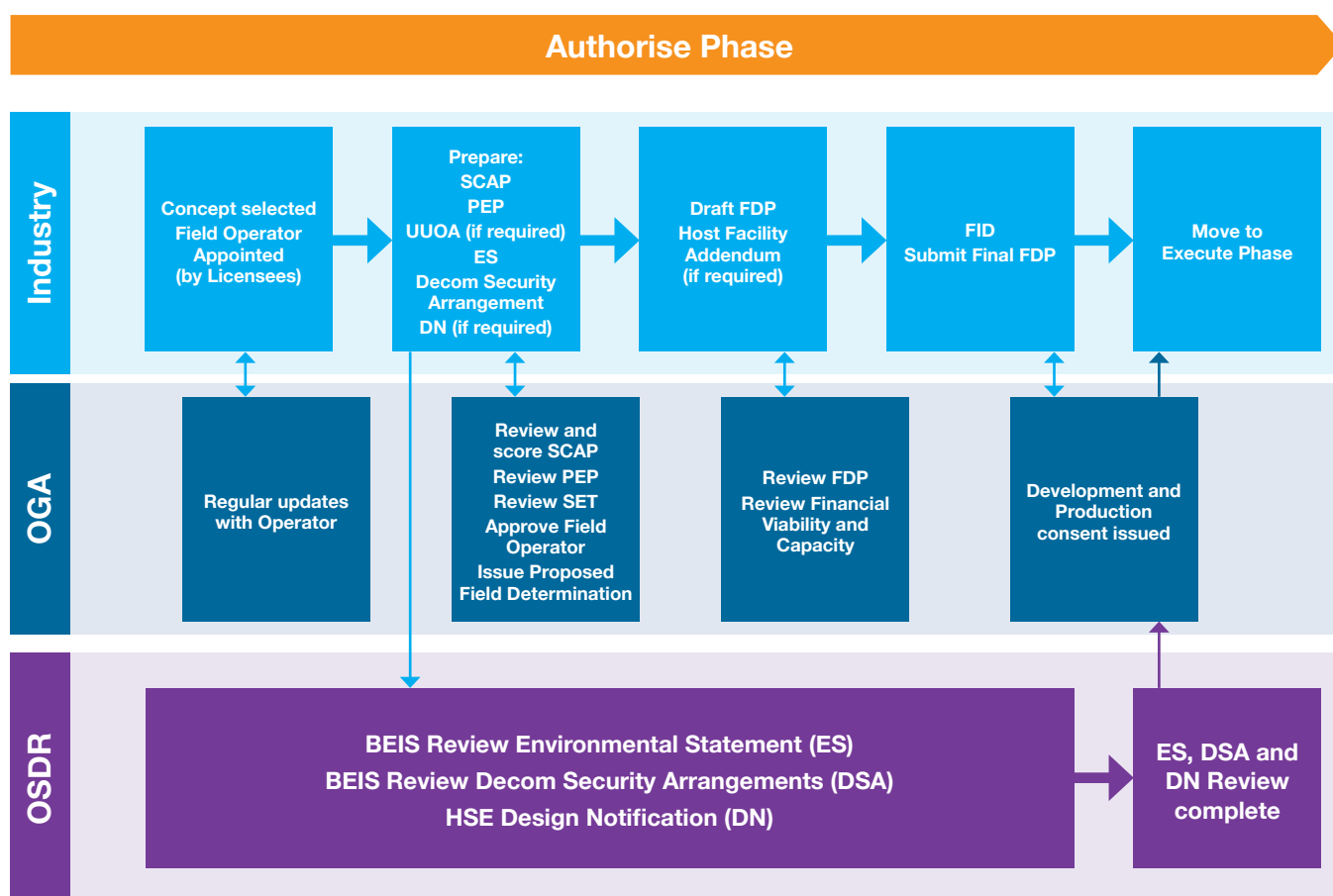
²⁰ <https://www.ogauthority.co.uk/exploration-production/asset-stewardship/expectations/>

²¹ <https://www.ogauthority.co.uk/exploration-production/development/enhanced-oil-recovery/>

²² <https://www.gov.uk/guidance/oil-and-gas-offshore-environmental-legislation>

5. Authorisation Phase requirements

Figure 4: Authorisation Phase



- 80.** During the Authorisation Phase the Licensees are required to undertake a number of activities in support of their application to obtain consent from the OGA to install facilities and produce hydrocarbons.
- 81.** At the end of the Authorisation Phase the Field Operator, on behalf of the Licensees, should submit an application via the UK Energy Portal for the necessary consents to be issued.²³ The issuing by the OGA of a Development and Production Consent for the proposed development via the UK Energy Portal indicates the completion of the Authorisation Phase.

Economic Evaluation

- 82.** Towards the end of the Authorisation Phase, the Field Operator should submit final details of the project economics in the SET format to account for any significant changes to the Economic Evaluation provided at the earlier Assessment Phase. The Field Operator should provide this information for the chosen development concept prior to internal approval of the project by Licensees.

Supply Chain Action Plan

- 83.** In the Authorisation Phase, the Field Operator should submit its final SCAP. It is recommended that the SCAP be submitted to the OGA prior to internal approval of the development by the Field Operator and the Licensees.

²³ <https://www.ogauthority.co.uk/licensing-consents/consents/production-consents/>

84. The SCAP submission should focus on the following criteria as per the OGA guidance:

- Engagement – early and continued engagement with the supply chain regarding the specifics of the project, aimed at improving project performance. This may extend to evidence of adoption of current industry tool kits such as those outlined in the Oil & Gas UK Supply Chain Code of Practice (SCCoP),²⁴ ECITB Project Collaboration Toolkit²⁵ and the OGA Project Pathfinder Portal.
- Trust – demonstration of trust and empowerment throughout the project life cycle – clearly identifying functional requirements and subsequently supporting the supply chain to deliver to their contractual commitments without bespoke, restrictive or client-specific requirements.
- Innovation – encouragement and fair evaluation for the proposed use of alternative/new products, processes and/or contracting methodologies.
- Quality – demonstration that historical performance, quality, employment practice and supplier culture is appropriately valued.

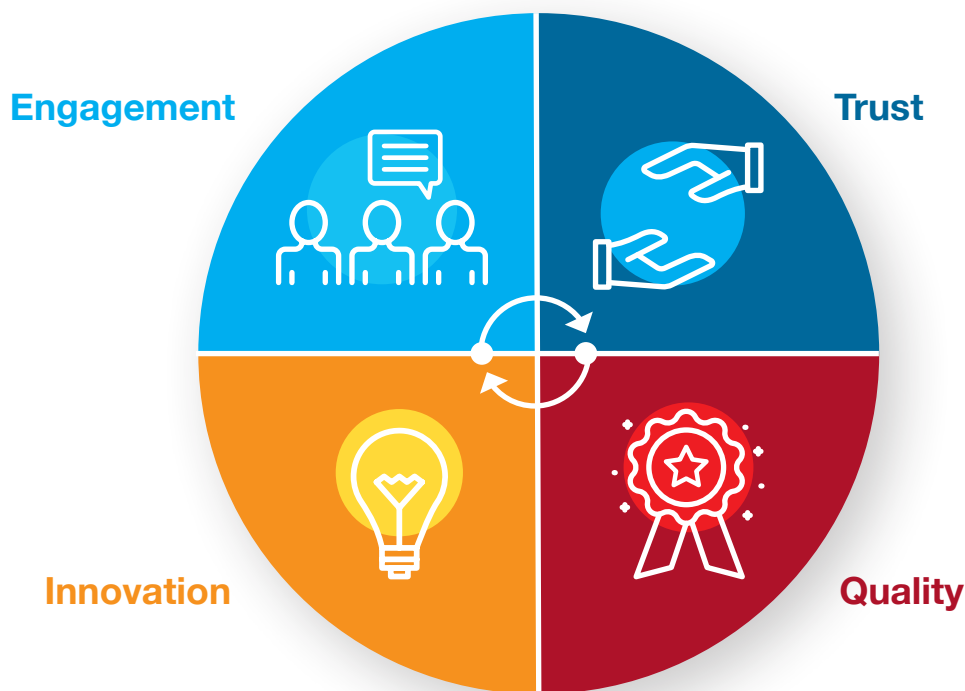
85. Once the final SCAP is submitted an assessment process will be undertaken by the OGA. Where all four of the above criteria are deemed to be acceptable, the SCAP would usually be endorsed with no further action.

In cases where one or more of the elements are deemed to be classed as below expectations, the OGA will seek improvement. In cases where improvements cannot be achieved, final endorsement will be withheld pending discussion between the Field Operator and the OGA.

86. There is no prescriptive format for a SCAP document or on how to prepare the required supporting evidence. It is preferred that the SCAP should be submitted as a single document where possible and, to aid consistent assessment, SCAPs should include as a minimum the following sections:

- Executive summary
- Company overview and contracting policy
- Project overview
- Evidence of engagement, trust, innovation and quality

Figure 5: Evaluation Criteria



²⁴ <https://oilandgasuk.co.uk/supplychaincodeofpractice.cfm>

²⁵ <https://www.ecitb.org.uk/Project-Management/Collaboration/Project-Collaboration-Toolkit>

Project Execution Plan

- 87.** The Field Operator should provide the OGA with an updated PEP covering the Authorisation Phase and prepare a PEP for the Execute Phase of the project, consistent with Stewardship Expectation SE-05 (Robust Project Delivery) Implementation Guide.

Field Determinations

- 88.** The Oil Taxation Act 1975 states that all fields must be “determined” by a boundary drawn around them. A Field Determination²⁶ will enable the Licensees with an interest in the licenced blocks in which the field is situated and Licensees in the adjacent blocks to understand what constitutes the field for both development and tax purposes. This is undertaken in two stages; first, the OGA will issue a proposed Field Determination at an early stage in the Authorisation Phase, utilising the geological information that is available to it at that time. Second, the final Field Determination will be issued when the FDP is consented to.

Development Area

- 89.** The FDP must relate to a defined area. In many cases such area will coincide with the Field Determination. However, the Field Operator, on behalf of the Licensees, may propose that the FDP covers an area (the ‘Development Area’) that differs from the Field Determination. For example, where the Field Determination is not unitised the Development Area would usually extend only to that part of the field covered by the FDP (see below). Another example where development well trajectories are outside the Determination (eg for optimisation) is a phased development, where the Development Area may be limited to that part of the field addressed in the detailed first phase proposals. The Development Area may be extended with subsequent phases. The Development Area will be agreed with the OGA and documented in the FDP.

Unitisation and Unit Operating Agreements (UUOA)

- 90.** Commercial and technical disputes may arise about the optimum development plan when an FDP is proposed for a field where the Field Determination extends into an area covered by an adjacent licence.

In such cases the OGA needs to be satisfied that the ultimate economic recovery of petroleum is maximised and that unnecessary competitive drilling is avoided. The most efficient way to satisfy these requirements, and avoid any possible delay in the consenting process, is for the Licensees to agree with their adjacent Licensees, and propose to the OGA, a unitised development or other commercial arrangement that facilitates a field development.

- 91.** Where such agreement is not reached or the proposed field development does not demonstrably satisfy these requirements, the OGA will wish to understand the circumstances and give all parties adequate opportunity to make representations.
- 92.** The OGA has powers under the licence model clauses to require a Field to be worked and developed as a unit between Licensees. The grounds for the use of this power are that the OGA considers it is in the national interest in order to secure the maximum ultimate recovery of petroleum and in order to avoid unnecessary competitive drilling.
- 93.** If, in any intended development, there is a likelihood of claims or disagreement between adjacent licence groups related to the field’s extent, the OGA should be consulted at an early stage.
- 94.** If a UUOA is put in place by Licensees, this will need to be submitted to the OGA for approval at the same time as the FDP.
- 95.** If the Licensees choose not to enter into a UUOA and propose an alternative commercial arrangement, it may be appropriate to define two or more Development Areas within the Field Determination to document different ownerships in the different parts of the field – this should be discussed with the OGA at an early stage in the FDP process.

Field Operator approval

- 96.** Prior to the seeking FDP consent, Licensees are required to appoint a Field Operator, which requires approval by the OGA. The OGA has published guidance on that process.²⁷

²⁶ <https://www.ogauthority.co.uk/exploration-production/development/field-determinations/>

²⁷ <https://www.ogauthority.co.uk/exploration-production/production/field-Operatorship/>

Host facility modifications

- 97.** In cases where a satellite field development is to be tied back to existing host facilities it is important that the Field Operator of the satellite development and the operator of the host facility work together to ensure an agreed plan for any necessary modification to the host facility.
- 98.** The OGA will require a letter of support from the operator of the host facility, endorsed by all co-venturers. The letter should cover the following points:
- A statement supporting the development of the satellite field(s) over the host facility and committing the host facility to provide the necessary processing services
 - A statement confirming the intent to execute the required commercial arrangements (Construction and Tie-In Agreement, Transportation, Processing and Operating Services Agreement, etc)
 - A summary of the major new equipment/modifications proposed to be carried out on the host facility to support development of the satellite
 - An assessment of the impact of the new satellite field production on existing production.
- 99.** Where the proposed modifications are substantial the OGA may require the operator of the host facility to submit an application for the OGA's consent to such modifications, supported by a document describing the new equipment/modifications proposed to be carried out on the host facility to support development of the satellite. This application and supporting document should be submitted to the OGA at the same time as the final FDP for the satellite field. If the respective Field Operators of the host facility and the satellite development prefer an alternative approach to documenting the proposed host modifications then this should be discussed with the OGA at an early stage, especially if the host facility is leased rather than owned by the host Field Operator.
- 100.** The OSDR may also require the Installation Operator of the host facility to submit a Design Notification for modifications to the host facility's Safety Case.

Environmental statement consultation

- 101.** The OGA cannot issue a Development and Production Consent for an FDP until the EIA process for the development has been completed.
- 102.** Under the Offshore Petroleum Production and Pipe-lines (Environmental Impact Assessment and other Miscellaneous Provisions) (Amendment) Regulations 2017, the Field Operator should submit a notice of their intention to apply for a Development and Production Consent and to submit a supporting ES. This notice should be submitted to the OGA (copied to BEIS) at the same time as the ES is submitted to BEIS, usually after the Concept Select decision. All ESs are subject to a period of consultation during which time any person or body with an interest in the proposed development may make their views known to the Secretary of State for BEIS. Licensees should bear in mind that the consideration of an ES generally takes several months and can take significantly longer than this if substantial representations are made by any of the consultees or members of the public, or if insufficient information is presented within the ES.
- 103.** Once BEIS are content with the information provided and that there are no environmental objections to the issue of consent for the project, BEIS will issue a letter to the developer advising them to that effect and will also notify the OGA of the conclusions of the ES review process, and advise the OGA of any environmental conditions that must be incorporated into any consent issued for the project.

Design Notification

- 104.** Where appropriate, the OSDR needs to have completed its review of the Design or Relocation Notification before the OGA issues a Development and Production Consent.
- 105.** Design Notifications (or Relocation Notifications where applicable) need to be submitted by the Installation Operator to the OSDR at an early stage of the design process. The Installation Operator should ensure the OSDR has sufficient time to complete their review of the Notification prior to the formal submission of a FDP. The OSDR guidelines²⁸ state that the OSDR require three months to complete its review of the notification.
- 106.** The Field Operator should advise the OGA of the outcome of the Design or Relocation Notification review, and any necessary steps needed to implement the OSDR's recommendations, prior to FDP Consent.

²⁸ <http://www.hse.gov.uk/pubns/books/l154.htm> pages 44 to 46

Decommissioning security arrangements

- 107.** BEIS Offshore Decommissioning Unit (ODU) need to be satisfied that appropriate financial security arrangements for decommissioning are in place.²⁹

Consent to the FDP

- 108.** The development will normally be consented to (pursuant to the applicable model clauses and/or EIA regulations) once the OGA is satisfied of the following:

- the FDP meets the Licensee's obligation to deliver MER UK
- the EIA process has been completed successfully
- OSDR have completed their review of the Design or Relocation Notification
- a Supply Chain Action Plan has been agreed by OGA
- a proposed Field Determination has been issued
- where appropriate, a Unitisation and Unit Operating Agreement has been put in place
- each Licensee has committed funding sufficient for their share of the development costs³⁰
- the OGA has approved a Field Operator for the development³¹
- Where appropriate, the host facility Operator and coventurers have confirmed their support for the development
- BEIS Offshore Decommissioning Unit are satisfied that appropriate decommissioning financial security arrangements are in place (see ODU guidance notes³² for more information)

It is also expected that a Project Execution Plan is in place which supports the objectives in the FDP and SE-05 Robust Project Delivery expectation.³³

- 109.** In the event the Licensees disagree among themselves on whether an FDP can be sanctioned, the OGA will wish to discuss the proposed FDP with any Licensee who has not voted to support the project to understand their reasons for not doing so. Licensees should note their obligations under the MER UK Strategy to allow others to seek to maximise the value of economically recoverable petroleum from their licences.

The OGA may be prepared to consent to the FDP if the necessary pass mark has been obtained under a formal vote called under the provisions of a Joint Operating Agreement or UUOA or if the Licensees have entered into a Sole Risk agreement. Licensees should note that any FDP submission that is not supported by all the Licensees is likely to take longer to achieve a Development and Production Consent than a proposal that is supported unanimously.

Time frame

- 110.** Provided that the process described in this guidance has been fully implemented, the OGA will usually aim to complete its review of the final submitted FDP within one month. The early review by the OGA of draft sections of the FDP, SCAP and PEP as these become available will help achieve this aim.

²⁹ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/704675/Offshore_Oil_and_Gas_Decommissioning_Guidance_Notes_May_2018.pdf

³⁰ <https://www.ogauthority.co.uk/media/4186/revfinancialguidancev5.pdf>

³¹ <https://www.ogauthority.co.uk/exploration-production/production/field-Operatorship/>

³² https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/704675/Offshore_Oil_and_Gas_Decommissioning_Guidance_Notes_May_2018.pdf

³³ <https://www.ogauthority.co.uk/media/3828/se-05.pdf>

Content of the FDP

- 111.** The FDP should provide a summary of the Licensees' understanding of the field although more information must be provided if required by the OGA. A suggested structure for the FDP is set out in separate OGA guidance.³⁴
- 112.** The content of the FDP should be agreed with the OGA and will depend on the complexity of the field, the degree of interaction prior to the submission and the issues identified.
- 113.** The FDP will provide a clear explanation of the commitments that the Licensees are making (in terms of facilities, number of wells, provision for IOR/EOR, provision for third party access hydrocarbon export routes etc.) to bring forward a sound development, rather than a detailed technical description of the subsurface reservoir or required infrastructure.
- 114.** The actual form of the development and the basis for field management should be described and sufficient detail will be required to permit development and production performance to be measured.
- 115.** The FDP document should be submitted formally by uploading a digital copy (preferably pdf) as an attachment to the UK Energy Portal application for Development and Production Consent.³⁵

Development and Production Consent

- 116.** The issuing by the OGA of a Development and Production Consent for the proposed development via the UK Energy Portal indicates the completion of the Authorisation Phase. The Development and Production Consent will cover both the construction of the facilities and other infrastructure, and the production of hydrocarbons from the field.
- 117.** The OGA will generally issue Production Consents for as long a duration as possible, consistent with the duration of relevant licences, and the technical and investment uncertainties associated with future production. The duration of the initial period of agreed production will usually reflect the degree of understanding of the field: the more uncertain the performance, the shorter the duration. Subject to the uncertainties involved, the OGA would anticipate a duration of between five years and life of field. For phased developments, the Development and Production Consent will normally be for the duration of the relevant phase.

The OGA may attach conditions to the Consent requiring the Field Operator to review the development plan with the OGA if performance falls outside consented production profiles or if the field is found to differ from the assumptions made in the FDP to such an extent that there is a risk of a loss of economic reserves. BEIS OPRED may also require the OGA to insert conditions in the Development and Production Consent where BEIS's approval of the ES is conditional.

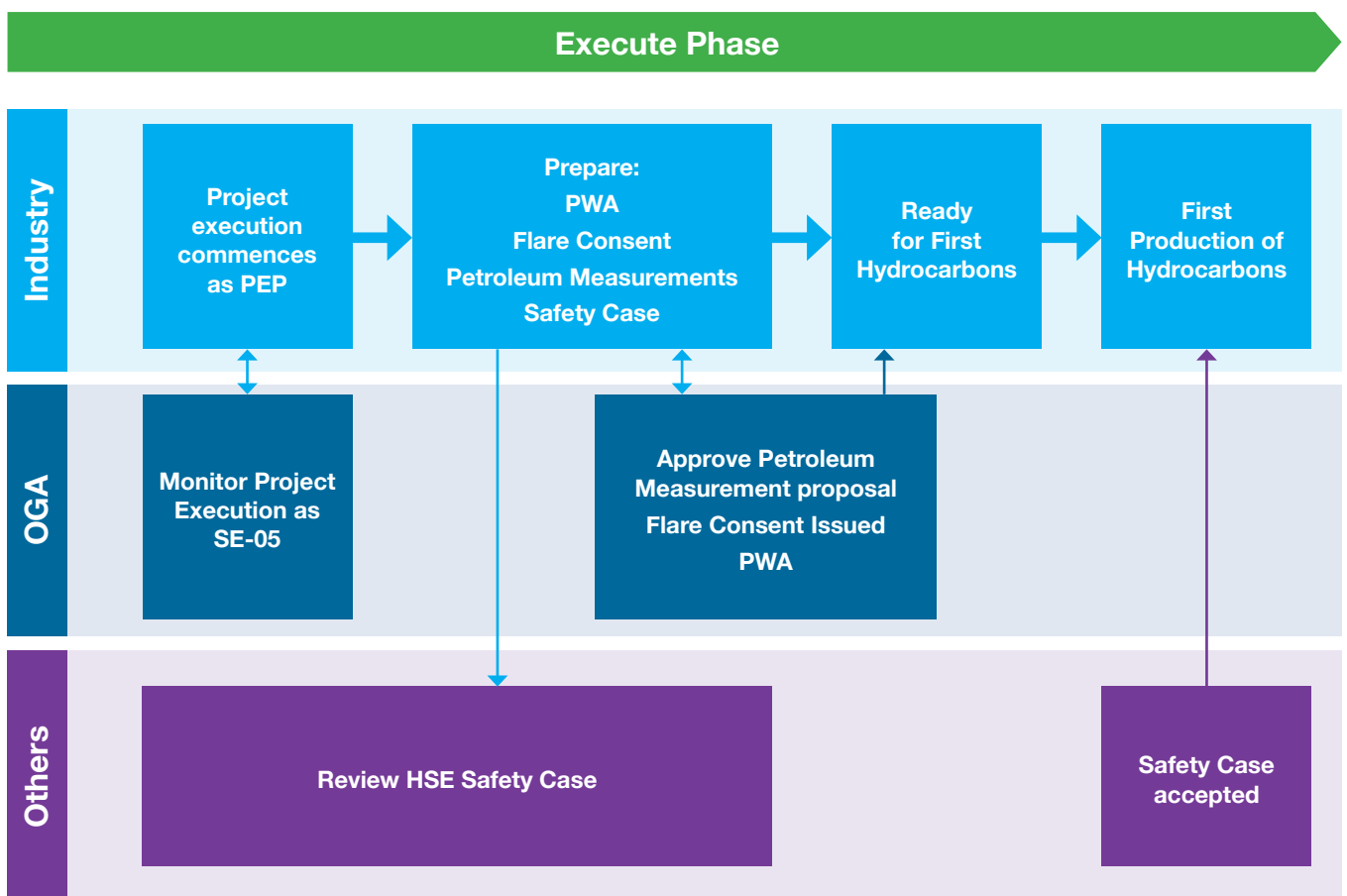
- 118.** For all fields both upper and lower limits to production levels will be included in the Production Consent. These will usually be based on the maximum and minimum cases as stated in the FDP. Licensees should however note that the OGA cannot issue a Production Consent at levels that exceed the maximum production given in the ES.

³⁴ <https://www.ogauthority.co.uk/media/3837/fdp-guidance.pdf>

³⁵ https://itportal.ogauthority.co.uk/eng/fox/oga/OGA_LOGIN/login/

6. Execute Phase requirements

Figure 6: Execute Phase



- 119.** The project scope as defined by the FDP and PEP will be implemented during the Execute Phase of the project. At this stage, the Licensees have committed to proceed with the development and the OGA has issued a Development and Production Consent. The purpose of this phase is for the Field Operator to execute all required activities (e.g. well construction, engineering, procurement, construction, commissioning/start-up etc and to safely deliver the project objectives.

The end of Execute Phase will be regarded as production of first hydrocarbons. The OGA's expectations during this phase are set out below.

Monitor project execution

- 120.** The FDP and PEP will include a project schedule including major decision points and milestones as well as permitting requirements. As part of the PEP the Field Operator should also discuss and agree an engagement plan with the OGA. During the Execute Phase, progress against the project schedule should be monitored and deviations from the planned schedule should be reported to the OGA.

Commissioning flare consents issued

- 121.** During the commissioning of production facilities, the OGA will issue flaring consents which 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.³⁶ Once commissioning is complete and stable operating conditions have been achieved the Field Operator may apply for longer durations for the flaring consent subject to an agreed cumulative maximum for the duration of the consent.

Pipeline Works Authorisations

- 122.** Pipeline Works Authorisations³⁷ ('PWA') will not usually be issued until after the FDP has been consented. The OGA has published separate guidance on the PWA process.
- 123.** A Pipeline Works Authorisation or variation should be in place before any pipeline or pipeline system construction or modification works begins. Before submitting an application, the OGA recommend that, the prospective owner informally consults both the OGA and the HSE at the earliest possible opportunity, to discuss the proposed scheme and the regulatory requirements.
- 124.** Where there are no objections, it takes approximately four to six months from receipt of a satisfactory application to issuing the PWA. In the case of pipelines in respect of which an environmental statement is required under the Offshore Petroleum Production and Pipelines (Assessment of Environmental Effects) Regulations 1999 (as amended), the procedure may take longer. Field Operators must therefore submit applications at least four to six months before construction begins.

Safety case accepted by OSDR

- 125.** Please refer to the OSDR website for further information.

Divergence from the agreed FDP

- 126.** Once an FDP has been consented to it is expected that the development will proceed in accordance with the Consented FDP and the PEP. The Licensee should inform the OGA of any deviations to the plan as they become evident.
- 127.** If the Licensees wish to deviate from the agreed FDP they may be required to submit a Field Development Plan Addendum ('FDPA').
- 128.** It is possible that a change to the consented FDP may require an EIA under the Offshore Petroleum Production and Pipe-lines (Assessment of Environmental Effects) Regulations 1999 (as amended). The Field Operator should contact OPRED for further information.

³⁶ <https://www.ogauthority.co.uk/licensing-consents/consents/flaring-and-venting/>

³⁷ <https://www.ogauthority.co.uk/licensing-consents/consents/pipeline-works-authorisations/>

7. Regulation following FDP Consent

Required future Consents

Development and Production Consent

129. If Licensees wish to continue production beyond the duration of the initial consent they may apply for an extension to the production consent via the UK Energy Portal.³⁸ If field production performance is expected to fall outside the upper or lower limits specified in the Production Consent, the Field Operator may apply via the portal for a revision to these levels. A request to increase the maximum production in the FDP Consent may also require the Field Operator to apply to BEIS OPRED via the PETS system³⁹ for their environmental permits to be revised.

Flaring and venting consent

130. 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. The OGA has published detailed guidance.^{40 41}

Pipeline Works Authorisation

131. If the Operator wishes to install new pipelines or vary the original specification of a pipeline, a Pipeline Works Authorisation or Variation may be required.⁴²

Cessation or suspension of Production

132. If Licensees wish to cease production permanently, or if production is to be suspended from a field for an extended period, the Operator should contact the OGA to discuss what notifications/authorisations may be required.⁴³

Retention and Reporting

133. Licensees have a number of obligations for retention and reporting of data and information for field developments. Please refer to the OGA website for additional information.⁴⁴

Changes of Licensee and/or Field Operator

134. Re-assignment of a Licensee's equity interest⁴⁵ or changes of Field Operator following FDP consent require the approval of the OGA.⁴⁶ A Change of Control of a Licensee should be notified to the OGA.⁴⁷

³⁸ <https://www.ogauthority.co.uk/licensing-consents/consents/production-consents/>

³⁹ <https://www.ogauthority.co.uk/site-tools/energy-portal-guidance/#wons-2>

⁴⁰ <https://www.ogauthority.co.uk/licensing-consents/consents/flaring-and-venting/>

⁴¹ <https://www.ogauthority.co.uk/media/5014/flaring-and-venting-policy-position-website.pdf>

⁴² <https://www.ogauthority.co.uk/licensing-consents/consents/pipeline-works-authorisations/>

⁴³ <https://www.ogauthority.co.uk/exploration-production/production/cessation-of-production/>

⁴⁴ <https://www.ogauthority.co.uk/exploration-production/asset-stewardship/surveys/>

⁴⁵ <https://www.ogauthority.co.uk/licensing-consents/licensing-system/licence-assignments/>

⁴⁶ <https://www.ogauthority.co.uk/exploration-production/production/field-Operatorship/>

⁴⁷ <https://www.ogauthority.co.uk/licensing-consents/licensing-system/change-of-control/>

Appendix A: Guidelines for the content of an FDP document

Guidance on the preparation and content of offshore oil and gas field development plans can be found on the OGA web site.⁴⁸

⁴⁸ <https://www.ogauthority.co.uk/media/3837/fdp-guidance.pdf>

Appendix B:

Roles and responsibilities

Table 2: Application of guidance by project types

WHO	ROLES & RESPONSIBILITY
LICENSEES	<ul style="list-style-type: none"> • Endorse FDP • FID/ Confirm commitment to funding • Finalise UUOA (if required) • Appoint a Field Operator • Appoint Installation Operator (if required)
FIELD OPERATOR	<ul style="list-style-type: none"> • Produce FDP on behalf of Licensees • Responsible for engagement with the OGA • Engage with BEIS
INSTALLATION OPERATOR	<ul style="list-style-type: none"> • Engage with HSE
OGA	<ul style="list-style-type: none"> • Agreement to Concept Select • Issue Field Determination • Approve Field Operator • Consent to FDP • Issue PWA • Issue Flare Consent • Approve petroleum measurement systems
BEIS	<ul style="list-style-type: none"> • Review Environmental Impact Assessment • Agree the Environmental Statement • Issue Environmental Permits • Agree Decommissioning Security Arrangements
HSE	<ul style="list-style-type: none"> • Review the Design Notification • Accept Safety Case

