

Representation - Draft Modification Report UNC 0607

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

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

To: enquiries@gasgovernance.co.uk

Representative:	Sinead Obeng
Organisation:	South Hook Gas
Date of Representation:	09 November 2017
Support or oppose implementation?	Support
Relevant Objective:	<p>a) Positive</p> <p>d) Positive</p> <p>(i) <i>between relevant shippers;</i></p> <p>(ii) <i>between relevant suppliers; and/or</i></p> <p>(iii) <i>between DN operators (who have entered into transportation arrangements with other relevant gas transporters) and relevant shippers.</i></p>

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

The proposed modification will extend the economic life of the Rhum gas field as well as the associated Bruce and Keith fields. This supports the OGA's MER strategy which seeks to maximise the economic recovery of UKCS fields. The proposal also supports gas security of supply and will provide a positive net value to the UK. We believe that there is sufficient evidence to support an increase of the CO₂ limit at St. Fergus to 5.5mol%, particularly as the analysis by BP and National Grid suggests any potential downstream and operational impacts will be limited by fortuitous commingling and ensuring total inerts remain below 7mol%.

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

N/A Panel determined it should be Authority Direction

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

Implementation should be as soon as practically possible following approval, to support UK gas security of supply.

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

If implemented, the proposal should not have any negative impact on South Hook Gas's business.

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

Yes

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

None

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

None