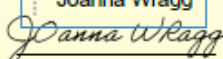


BGS response to the Consultation on information and sample related matters in Carbon Dioxide Appraisal and Storage and Petroleum Licences

<https://www.nstauthority.co.uk/media/8688/nsta-consultation-ccs-data-disclosure-final.pdf>

Annex 1: Response coversheet

 North Sea Transition Authority	CONSULTATION ON INFORMATION AND SAMPLE RELATED MATTERS IN CARBON DIOXIDE APPRAISAL AND STORAGE AND PETROLEUM LICENCES
To: CS Data Disclosure Consultation	
YOUR DETAILS	
Name: Joanna Wragg Company/Organisation: British Geological Survey Position: Science to Policy Adviser E-mail address: BGSPolicy@BGS.ac.uk Address: British Geological Survey, Environmental Science Centre, Keyworth, Nottingham, NG12 5GG Representing:	
CONFIDENTIALITY Please tick below if you consider any part of your response is confidential, giving your reasons why:	
Nothing ☐	
Whole response ☐	
Part of the response ☐	
If there is no separate annex, which parts?	
Name/contact details/position	
Company/organisation	
If you want any part of your response, your name or your organisation to be kept confidential, can the NSTA still publish a reference to the contents of your response including (for any confidential parts) a general summary that does not disclose the specific information or enable you to be identified? YES / NO	
DECLARATION	
I confirm that the correspondence supplied with this coversheet is a formal consultation response that the NSTA can publish, except as indicated above.	
However, in supplying this response, I understand that the NSTA may need to publish all responses, including those which are marked as confidential.	
If I have sent my response by email, will you disregard any standard e-mail text about not disclosing email contents and attachments.	
Name: Joanna Wragg	
Signed (if hard copy): 	

The British Geological Survey (BGS) is a world leading applied geoscience research centre, which provides objective and authoritative geoscientific data, information, and knowledge to inform government on the opportunities and challenges of the subsurface environment.

Principles of data retention, reporting and disclosure

Q1 Do you agree that in principle similar data gathering powers should apply to CS licences as are currently in place for petroleum licences?

R: Yes.

Q2 Do you agree that in principle, information and samples from carbon storage activities that are reported to the NSTA should be disclosed following a period of confidentiality?

R: Yes

Q3 Do you agree that the disclosure of carbon storage information and samples by the NSTA would be of benefit to the carbon storage industry and also to the petroleum industry and other users of, or those with an interest in, the UKCS?

R: Yes

Q4 Do you have any comments on the principle of disclosure of carbon storage related information and samples by the NSTA?

R: BGS are happy to provide a facility to core and cuttings, fluid samples and relevant data which could be created through a change in legislation, however, a funding model for this would need to be discussed.

Q5 Do you have any comments on specific information and samples that should be retained, reported and disclosed from carbon storage related activities (e.g. from a specific tool, operation or activity that is specific to carbon storage)? Information Samples Plans and Information and Samples Coordinators

R: Well construction, completion, workover and abandonment records will be very important in assessing risks of leakage from wells and assessing the potential re-use of wells. Records should include detailed accounts of materials used (including steel and cement compositions), plans and drawing of all wells from construction through to abandonment, and all location information.

Parameterised geological models are commonly used when evaluating hydrocarbon reserves, field development and production. These models should be acquired by NSTA and made publicly available. Models should be provided in industry standard formats. Methods of construction and parameterisation, including supporting datasets and evidence for assigning parameter values should be included in a written report. This would greatly help future CS licence applicants and researchers to further evaluate CO₂ storage potential.

Production data, including volumes produced, pressure changes during and at end of field life are very valuable for history matching to predictions of future CO₂ operations.

Pressure data before and after any well shut-ins can provide very valuable information on recharge and reservoir connectivity and should be preserved.

Downhole temperature data, where collected, is essential.

Any downhole testing, including inter alia injection tests, leak off tests should be collected.

Special Core Analysis (SCAL) data and reports should be collected and made publicly available– including fluid chemistry data and any analyses of core material.

Quantification of permeability /porosity (as accommodation space for CO₂), pressure data, mineralogy, well test information for calculating stress parameter data and fluid water chemistry.

All samples of core and subsamples should be collected and retained for public access at BGS (suitably preserved, including high resolution photography as is current practice).

All samples of fluids should be collected and retained (appropriately preserved) for public access at BGS.

Given the volume limitations and high cost of collection of fluid samples, NSTA should consider ensuring standard minimum analyses on all fluid samples at time of receipt including major and trace element chemistry, pH, Total Dissolved Solids, Total Organic Carbon and gas compositions.

Seismic data, well logs should be collected and made publicly available, as is current practice.

Whilst eventually a period of confidentiality might be appropriate, given the NSTA's role in encouraging CS licence development, including provision of pre-competitive information for future CS licensing rounds, the period of confidentiality should be reduced to a minimum initially (to 2035 for example). Faster data sharing and sample provision should support the nascent CS industry to develop more quickly and reduce uncertainty more effectively.

Information Samples Plans and Information and Samples Coordinators

Q6 Do you agree in principle that there is a benefit in having Information and Samples Plans, similar to those required in respect of petroleum data, for CS licences?

R: Yes

Q7 Do you agree in principle that there is a benefit in having Information and Samples Coordinators for CS licences?

R: Yes

Q8 Do you agree that in principle, operator changes (both Exploration Operator and Storage Operator) should require an ISP for CS licences?

R: Yes

Q9 Do you agree that in principle, a change of control should require an ISP for CS licences?

R: Yes

Q10 Do you agree that in principle, licence subarea operator changes should require an ISP for petroleum licences?

R: Yes

Q11 Do you agree that in principle, a change of control should require an ISP for petroleum licences? Principles of NSTA general data gathering power

R: No response

Principles of NSTA general data gathering power

Q12 Do you agree that in principle the NSTA should have a general information gathering power related to its functions?

R: Yes

Q13 Are there any restrictions and/or limitations on the exercise of such a general information gathering power you consider would be appropriate?

R: No response.