Offshore Petroleum Regulator
for Environment & Decommissioning

ENVIRONMENTAL ALERT	
ALERT NUMBER: 002/2023	**ISSUE DATE:** 19/05/2023

INCIDENT / ALERT DETAILS:

A review of data submitted to OPRED suggests there may be an over report of the mass of oil discharged to sea during non-compliant periods.

INITIAL/ALERT FINDINGS:

Exceedance of permitted monthly average oil in produced water concentration.

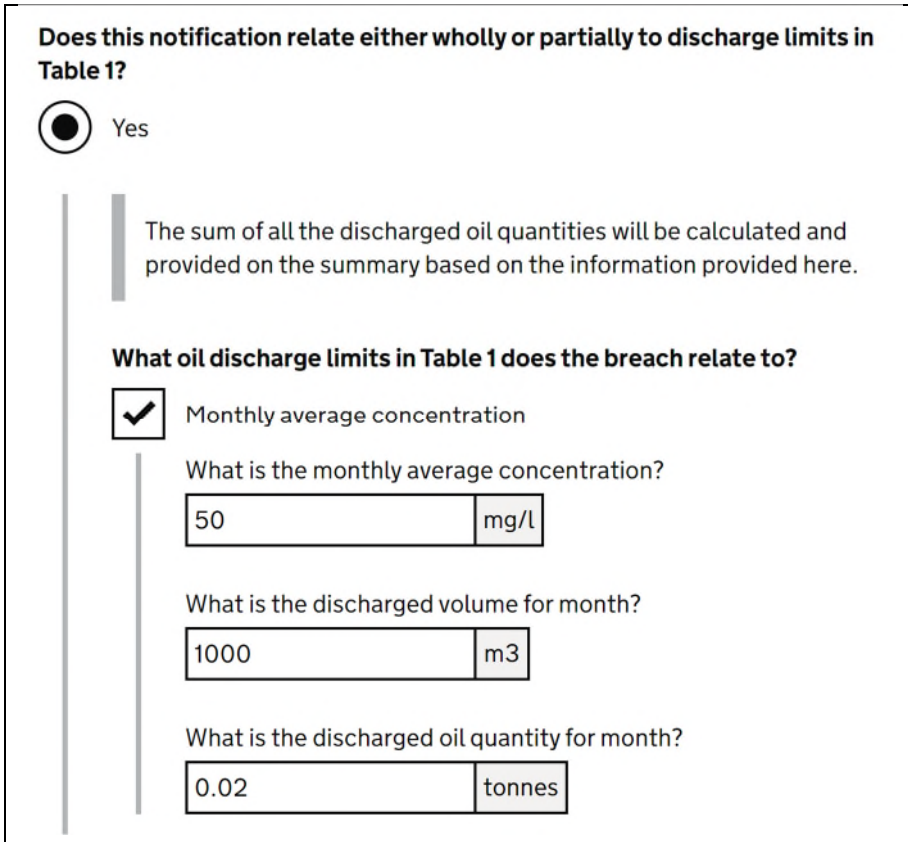
Where the monthly average oil in produced water concentration exceeds the permit limit, typically 30 mg/l, only the oil discharged to sea in excess of 30 mg/l (or other limit as appropriate) needs to be reported, not the total oil discharged to sea for that month.

For example, 1000 m3 of produced water is discharged to sea for a month at an average concentration of 50 mg/l.

Mass of oil required to be reported to OPRED via OPPC non-compliance, noting 1000 m3 equals 1000000 L, is;

(50 mg/l -30 mg/l) x 1000000 L = 20000000 mg = 20 kg = 0.02 tonnes.

In this example the data entered into the non-compliance is;



Exceedance of other permit limits.

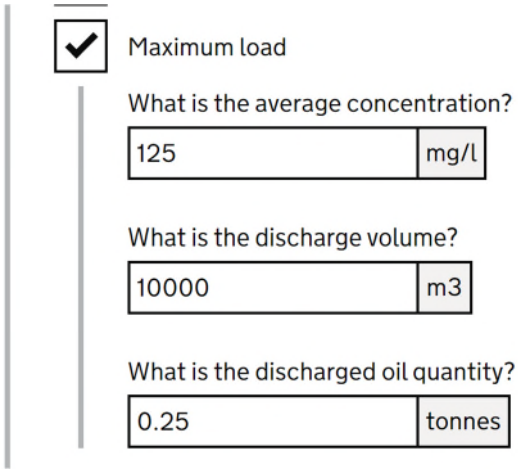
This approach should also be taken when reporting the following breaches;

- Maximum load (t/12 hr)
- Average concentration for the period of operation (mg/l)

For example, in the situation there is a permitted maximum load of 1 tonne oil discharge to sea in a 12 hour period, where10000 m3 of water was discharged in that 12 hour period at a concentration of 125 mg/l, this equates to an oil discharge of;

125 mg/l x 10000000 L = 1.25 x 10^9 mg = 1250 kg = 1.25 tonnes

Only the excess oil discharged over the permitted discharge is required to be reported in the non-compliance i.e. 1.25 – 1 = 0.25 tonnes.



Exceedance of maximum concentration of oil in produced water concentration.

Where the maximum concentration of oil in produced water is exceeded, typically 100 mg/l, permit holders should continue to report the concentration > 100 mg/l along with the volume of water discharged for the period where > 100mg/l oil in produced water is discharged to sea.

The total quantity of oil discharged (within permit limits and any non-compliant quantity) is still to be reported via OPPC EEMS returns as normal.

Future actions

IRS will be updated, by a combination of onscreen guidance and/or automated calculations to ensure that only the non-compliant portion of the discharge is calculated/reported. Moreover the IRS guidance will be updated.

Further Information

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Any queries relating to this alert should be addressed to:

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