

Planning Act 2008

Application for the Morecambe Offshore Windfarm Generation Assets Development Consent Order (EN010121)

Joint statement made by Harbour Energy and Spirit Energy

1. This joint statement is made by Chrysaor Resources (Irish Sea) Limited (**Harbour Energy**) and Spirit Energy Production UK Limited (**Spirit Energy**). It responds to the final part of Question 1DCO5 in the Examining Authority's written questions and requests for information (**ExQ1**) [PD-011]:

Could Harbour Energy and Spirit Energy please liaise with each other to ensure that no proposed changes to respective Protective Provisions are mutually exclusive given their interests in the area

2. The parties agree that where any matter is not expressly stated within this joint statement, that should not be taken to imply agreement between the parties on that matter.
3. The purpose of this joint statement is to set out:
 - (a) the different roles and responsibilities of Harbour Energy and Spirit Energy in relation to the Calder platform, wells, pipelines, and power cable located in United Kingdom Continental Shelf Block 110/7a (the **Calder field facilities**); and
 - (b) the requirement that the respective protective provisions for the benefit of each of Harbour Energy and Spirit Energy in Part 3 of Schedule 3 of the draft Development Consent Order (**DCO**) [[REP2-002](#)] in relation to the DCO application made by Morecambe Offshore Windfarm Ltd (the **Applicant**) for the proposed Morecambe Offshore Windfarm Generation Assets (the **Proposed Development**) adequately reflect such differentiation of roles and responsibilities noted in 3(a) above.
4. The Calder field facilities are owned by Harbour Energy. The hydrocarbon field known as the Calder field which underlies United Kingdom Continental Shelf Block 110/7a (the **Calder field**) is licenced by Harbour Energy under petroleum production licence P.99. The Calder field facilities are required to safely produce hydrocarbons from the Calder field.
5. Spirit Energy currently operates the Calder field facilities on behalf of Harbour Energy and is thereby subject to regulatory operatorship requirements in respect of the Calder field facilities, together with contractual obligations under the operational agreement between Spirit Energy and Harbour Energy. Of the Affected Assets, the Calder field facilities are the only assets within the Morecambe Hub which Spirit Energy operates but does not own.
6. Harbour Energy is the sole licensee and appointed licence operator under petroleum production licence P.99 which governs the Calder field and is thereby subject to regulatory

requirements in respect of the Calder field facilities, together with contractual obligations under the operational agreement between Spirit Energy and Harbour Energy.

7. The Proposed Development is located adjacent to the Calder field facilities, as shown on the Applicant's Offshore Work Plan [[APP-007](#)]. The Relevant Representations and Written Representations submitted by each of Harbour Energy [[RR-027](#), [REP1-102](#)] and Spirit Energy [[RR-077](#), [REP1-116](#)] set out their respective concerns in relation to the impact of the Proposed Development.
8. For the purpose of drafting and agreeing protective provisions in relation to the Calder field facilities, the parties have been liaising with each other to ensure that no proposed changes to respective Protective Provisions are mutually exclusive given their interests in the area. The parties will continue to work together in line with the Examining Authority's request under ExQ1 1DCO5.
9. Notwithstanding, as Harbour Energy and Spirit Energy have separate interests and duties in respect of the Calder field facilities, and such duties will change over time as the Calder field moves from the operational producing phase to the decommissioning phase, it is their intention that some separate protective provisions will be required in the DCO to address their respective concerns.
10. Both Spirit Energy and Harbour Energy will engage directly with the Applicant to agree the terms of their respective protective provisions. It is envisaged that there will be common elements within each of the protective provisions in respect of the shared interest in the Calder field facilities and to this end, Harbour Energy and Spirit Energy will work together to ensure commonality between those where there is a shared potential impact and consensus on the related mitigation solution.
11. The Applicant has indicated that the next update to the draft DCO is due to be submitted at Deadline 4 (18 February 2025) and that they would look to include amendments to the protective provisions at that update. The parties are engaging with the Applicant on this basis.

Question No.	Addressed to	Question	Harbour Energy Response
1CAR6.	Harbour Energy Spirit Energy	<p>Additional Mitigation – Aviation Corridor</p> <p>At D2 the Applicant introduced new mitigation in the form of a 2nm wide take-off access corridor from Spirit Energy’s CPP1 platform (the Aviation Corridor) and this is proposed to be secured within updated Protective Provisions contained within the updated dDCO [REP2-002]. Does the Applicant’s response at D2 and the inclusion of this additional mitigation now address Harbour Energy and Spirit Energy’s concerns and objection?</p>	<p>Harbour Energy has carefully considered the Applicant’s proposed mitigation involving the Applicant keeping a 2nm aviation corridor free from wind turbine generators and necessitating the aviation service provider supporting Calder Field operations obtaining approval from the CAA to operate helicopters under an alternative method of compliance (AltMoC). The proposed mitigation needs to be considered separately for the production phase of Calder Field operations and for the decommissioning phase.</p> <p><u>Production Phase</u></p> <p>Whether or not an AltMoC could be adopted is a matter that Spirit Energy and its helicopter operator would need to determine and not a decision that Harbour Energy can make. Harbour Energy has however calculated that, were it possible to implement the proposed additional mitigation, the annual average loss of all opportunities currently available to make a pair of trips to the Calder Platform with at least 7hrs between outward and return flights would fall from 56% to 33%.</p> <p><u>Decommissioning Phase</u></p> <p>It would not be possible prior to approval of the DCO to determine whether an AltMoC could be applied for and obtained as:</p> <ul style="list-style-type: none"> • Harbour Energy would need to consult with its helicopter operator, once selected, to determine whether operation under such an AltMoC would be acceptable; • Until the CAA implements new rules in respect of flying in proximity to wind farms, such an AltMoc could not be applied for.

			<p>Harbour Energy has however calculated that, were it possible to implement the proposed mitigation, the annual average loss of all opportunities currently available to fly to an NPI at the Calder Field would fall from 26% to 18% and the corresponding loss in winter months would reduce from 40% to 29%.</p> <p>Based on the above, considerations and those set out more fully in Harbour Energy Comments on Applicant's Deadline 2 Submissions (to be submitted at Deadline 3), Harbour Energy, whilst recognising that the Applicant's proposed additional mitigation has some theoretical merit, does not consider that the inclusion of this additional mitigation addresses Harbour Energy's concerns.</p>
1DCO5.	Those parties who would benefit from protective provisions	<p>Protective provisions</p> <p>Could all parties who would benefit from Protective Provisions, please indicate whether they are content with the wording set out in Schedule 3 of the draft DCO [REP2-002]? If not, could the party please explain why it is not content and provide alternative wording, setting out why each and all proposed changes are necessary. Could Harbour Energy and Spirit Energy please liaise with each other to ensure that no proposed changes to respective Protective Provisions are mutually exclusive given their interests in the area.</p>	<p>Harbour Energy has significant concerns with the Protective Provisions in Rev 3 of the draft DCO (REP2-002) (PPs) submitted by the Applicant at Deadline 2. Consistent with the Joint Statement from Harbour Energy and Spirit Energy to be submitted at Deadline 3, Harbour Energy continues to work with the Applicant and, where appropriate, in consultation with Spirit Energy concerning drafting of protective provisions.</p>