

Fra: Catherine Witt[Catherine.Witt@storegga.earth]

Sendt: 28.11.2025 17:35:41

Til: Søkkelldirektoratet[postboks@sodir.no]

Kopi: John McLaughlin[John.Mclaughlin@storegga.earth]; Ben

Leith[ Ben.Leith@storegga.earth]; Elaine Campbell[ elaine.campbell@storegga.earth];

Tittel: Storegga response to public consultation on changes to two regulations

---

You don't often get email from catherine.witt@storegga.earth. [Learn why this is important](#)

Hello,

Thank you for the opportunity to provide feedback on the proposed changes to two regulations. Storegga have provided some comments/questions on an “unofficial” English version of the document – we hope that is ok. We recognise that some of our comments may be influenced by a poor translation rather than what is actually intended. Please note that we are not an oil & gas company we have limited our comments to the Introduction and the Carbon Storage sections.

#### **Introduction:**

- Section 1: Mandatory Collection Requirements – What are the definitions of “exploration” and “selected appraisal and injection wells” in relation to CO<sub>2</sub> storage? If the 1<sup>st</sup> well drilled by the CS operator then could require core of entire reservoir thickness – is that the intention?
- Section 3: New requirements for well data: Would this be mandatory or based on if sufficient data are available, i.e. if core already exists in the caprock? Does this apply to “selected appraisal and injection wells” as per reservoir, or all wells?

#### **Proposal for amendments to regulations on documentation for CO<sub>2</sub> storage on the Norwegian shelf**

- Section 16: *“At least one conventional core shall be taken from all reservoir intervals where it may be relevant to store CO<sub>2</sub> in exploration wells. In addition, cores of relevant cap rocks shall be taken”* Does this mean one core for the entire storage interval or one core over all intra reservoir zones?
- Section 16: *“It is further proposed to include a new requirement in the second paragraph letter c) that cores of relevant cap rocks shall be taken in appraisal and injection wells.”* In this text there is no “selected wells” – does this mean all wells?
- Section 16: *“It is also proposed to include a new requirement in the second paragraph, letter e), that formation testing be carried out in exploration wells and in selected appraisal wells.”* This doesn’t include the word “logging” - does this therefore mean it has to be an actual well test? Or does a flow test via e.g. an MDT tool suffice?

Thank you for your consideration of these comments,  
Catherine

**Catherine Witt**  
**Head of Subsurface & Wells**

**T:** +442045994313  
**W:** [storegga.earth](mailto:storegga.earth)

**STOREGGA**

*This message, its contents and any attachments are private, confidential, may be legally privileged, and may contain information that is subject to copyright. It is intended solely for the addressee. If you are not the addressee or an authorized agent acting on their behalf, or if you have otherwise received this message in error, please inform the sender immediately and do not copy, distribute or use it in any other way but instead immediately delete it. Whilst we take reasonable precautions to prevent computer viruses and other interferences or interceptions in communication, we cannot accept responsibility for viruses transmitted to your computer or any other disruption in communication lines.*