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Bizanos , 1st October 2022

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Attention

Steinar Vervik

NPD – Norway

Reference :

Consultation on Regulations relating to fiscal measurement in the petroleum activities

Dear Steinar

First of all , thank you very much for having shared the new NPD project for fiscal measurement regulations .

I understood consultation was open up to 1st of October 2022 so I have prepared a couple of comments and suggestions which are **highlighted in yellow** in attached word .

I have appreciated your new chapters on multiphase metering and on allocation . Having personally conducted a lot of measurement and allocation audits in the Norwegian sector , I observed several times that a clear & comprehensible documentation describing all allocation steps was missing . On a

more general basis , allocation shall be auditable & clear which is to my understanding indicated when regulations indicate an audit trail shall be available.

To my opinion , fiscal allocation has to allocate petroleum (liquid & gas hydrocarbon) but also fuel & flare .

Allocation regulation is mentioning PVT properties determination as part of the allocation process which is true when allocation is using allocation parameters / properties derived by simulation using PVT composition of fluids . I added the comment **when used** because allocation may be carried by using just composition of fluids (component by component allocation) without using simulations .All details will be found in coming ISO TR 26762 to be published in 2023

I hope my inputs would help. Don't hesitate if you need something else or clarifications

All my best regards

Jean-Paul Couput