



Norwegian Offshore Directorate
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Submitted By Email: postboks@sodir.no

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REF: Consultation – proposed new Regulation on data collection and documentation for mineral activities on the continental shelf

To whom it may concern,

On behalf of the EnerGeo Alliance, this consultation response has been prepared in order to highlight our views in relation to the consultation on the proposed new regulation on data collection and documentation for mineral activities on the Norwegian continental shelf (NCS).

About the EnerGeo Alliance

Founded in 1971, the EnerGeo Alliance is a global trade association for the energy geoscience industry, the intersection where earth science and energy meet. Providing solutions to revolutionize the energy evolution, the EnerGeo Alliance and its member companies span more than 50 countries, representing onshore and offshore survey operators and acquisition companies, energy data and processing providers, energy companies, equipment and software manufacturers, industry suppliers, service providers, and consultancies. Together, our member companies are the gateway to the safe discovery, development, and delivery of mainstay sources of energy, alternative energy, and low-carbon energy solutions that meet our growing world's needs.

Through reliable science- and data-based regulatory advocacy, credible resources and expertise, and future-focused leadership, the EnerGeo Alliance continuously works to develop and promote informed government policies that advance responsible energy exploration, production, and operations. As the global energy demand evolves, we believe that all policymakers and energy

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companies, providing mainstay, alternative, and low-carbon solutions, – should have access to reliable data and analysis to support their forward moving efforts.

Members of EnerGeo Alliance have been active on the Norwegian Continental Shelf (NCS) for many decades, providing critical subsurface data in pursuit of hydrocarbon exploration and more recently for carbon storage and offshore wind planning purposes. For mineral exploration, as with these existing activities, exploration surveys provide critical data regarding the seabed and subsurface through the acquisition of modern geophysical data and the critical insights which are derived through processing and interpretation of those data. Throughout all such acquisition projects, members of EnerGeo Alliance follow industry best-practice and regulatory requirements as they pertain to data handling, storage and reporting, as well as all health, safety and environmental aspects of conducting operations at sea. In that regard we wish to provide some high-level comments of relevance to the draft regulation.

Notification in connection with investigations

EnerGeo note the requirement for an assessment of '*whether a survey activity may damage particularly vulnerable environmental resources*'. We wish to note that on the basis of following advice to industry regarding restricted areas and times from the Norwegian Institute for Marine Research¹, there should be no detrimental impact from temporary, transitory and non-intrusive geophysical survey investigations.

Special requirements for conducting a geophysical surveys

The requirement for a soft-start of the acoustic source is noted and in-line with existing practice for mitigating the potential effects of impulsive sources on marine species. EnerGeo wish to highlight that industry regularly applies best practice mitigation methods² developed jointly with the International Association of Oil and Gas Producers (IOGP) which are considered conservative.

Requirements relating to fishing operations and the use of a fisheries expert are well understood and common practice for operations. Members of EnerGeo Alliance are committed to pro-active

¹ The Institute of Marine Research's advice on man-made noise in the ocean: <https://www.hi.no/hi/nettrapporter/rapport-fra-havforskningen-2025-1>

² Recommended monitoring and mitigation measures for cetaceans during marine seismic survey geophysical operations: https://energeoalliance.org/wp-content/uploads/2019/07/579_new.pdf

engagement with fishers in order to manage and minimise any spatio-temporal overlap that could impede either industry in conducting their operations.

Reporting and submission of documentation, data and samples

EnerGeo note the requirement to report geophysical field data (section 20.a). We wish to highlight that per the Yellow Book reporting guidelines, companies are able to '*apply to the NOD for exemption from reporting field and pre-stack data from market available surveys when the survey acquisition is completed*' (Section 5.3)³. We believe that this common practice for hydrocarbon exploration should be extended to mineral exploration activities, and note the importance of data confidentiality for market available data, the terms of which may require extension from the standard 10-year duty of confidentiality due to the nascency of the sector and uncertainties regarding later phases of work. We recommend either a longer confidentiality period (e.g. 20 years) or a mechanism to apply for extended terms.

Summary

EnerGeo appreciates the opportunity to provide comments on the draft regulation and wishes to highlight the importance of the energy geoscience sector to the success of safe and sustainable mineral exploration activities within Norwegian waters. We remain at the disposal of the NOD to discuss our response or for any further information or clarification regarding the energy geoscience sector.

Sincerely,

Bengt Larssen

Chair – EnerGeo Alliance Norway Workgroup

Copies to:

Kristin Ebne – Vice Chair – EnerGeo Alliance Norway Workgroup

Dustin Van Liew – Vice President, Global Policy and Government Affairs

Ross Compton – Director, Global Policy

³ Guidelines for reporting geophysical data to authorities (Yellow Book): <https://www.sodir.no/globalassets/1-sodir/regelverk/forskrifter/en/geophysical-guidelines.pdf>