

**Det Kongelige Olje og Energidepartement**

Postboks 8148 Dep

0033 OSLO

Sandnes, 12.04.2019

Ref.: 735/CD

**SUBJECT: APA 2019 – Hearing – APA- acreage, proposal for extension**

Dear Sir,

Reference is made to invitation from the Ministry dated 14.03.2019 to give comments to the proposed extensions of the APA-acreage.

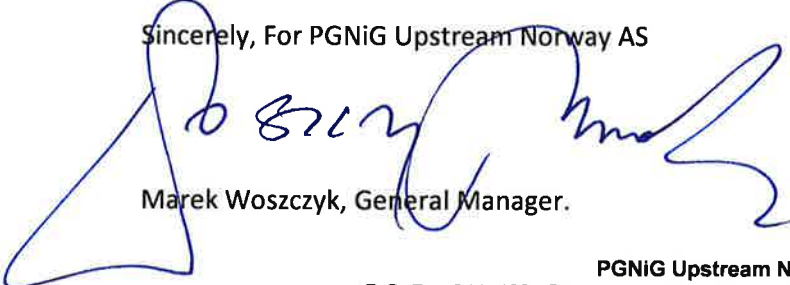
PGNiG Upstream Norway AS (PGNiG UN) considers the annual APA licensing rounds as an important element of the Norwegian Continental Shelf licensing system creating a business environment characterized by predictability which encourages continuous development of skills, database and knowledge in the company. Extending the APA acreage to include areas that represents logical continuations of past licensing and exploration efforts contributes significantly to the attractiveness of the annual APA licensing rounds.

PGNiG UN has increased its focus on gas exploration due to the sanctioning of a new gas pipeline connection between Norway and Poland. Because of this, the planned extension of the APA westward in the gas prone area of the Norwegian Sea is particularly welcome.

None of the proposed extension areas are considered to represent new or different challenges related to operational standards or preparedness requirements relative to the areas already included in the APA acreage.

PGNiG UN supports the proposed extensions of the acreage to be included in the APA 2019 Licensing Round.

Sincerely, For PGNiG Upstream Norway AS



Marek Woszczyk, General Manager.

**PGNiG Upstream Norway AS**

P.O. Box 344, 4067 Stavanger, visitor address: Vestre Svanholmen 4, 4313 Sandnes  
Organization number: NO 991 317 155 MVA  
[www.pgnig.no](http://www.pgnig.no)