



Det Kongelige Olje og Energidepartement
Postboks 8148 Dep
0033 OSLO

Stavanger 31/01/2017

Ref.: PGN/679/CD

SUBJECT: APA 2017 – Hearing – APA- acreage proposal for extension

Dear Sir,

Reference is made to invitation from the Ministry dated 13.12.2016 to give comments to the proposed extensions of the APA-acreage.

PGNiG Upstream International AS (PGNiG UI) 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.

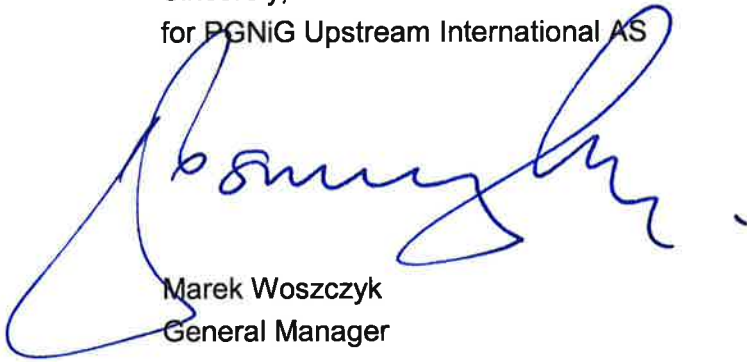
PGNiG has a long term strategy to secure gas supply to Poland via a pipeline connection. The extensions proposed to the west of the existing Norwegian Sea APA area provide a good opportunity to explore for gas, and are therefore especially welcomed.

The extensions proposed in the northern central Barents Sea are well placed with respect to a future coordinated development of the Wisting discovery and its' satellites. This an area where PGNiG UI's Tromsø office is actively exploring. Here the seismic and well data coverage is good, and knowledge within the industry about the sub-surface is extensive. A Barents SE area development may also provide a centre point for a future APA area.

None of the proposed extension areas in the Norwegian Sea or the Barents Sea is 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 UI therefore supports the proposed extensions of the acreage to be included in the APA 2017 Licensing Round.

Sincerely,
for PGNiG Upstream International AS

A handwritten signature in blue ink, appearing to read 'Marek Woszczyk', is written over the typed name and title. The signature is fluid and cursive, with a large initial 'M'.

Marek Woszczyk
General Manager