

Olje og Energidepartementet v/Olje- og gassavdelingen Postboks 8148 Dep 0033 Oslo postmottak@oed.dep.no

Attn: Lars Tarald Kvam

Stavanger, 06/01/2016

RESPONSE TO HEARING - THE APA2016 AREA AND PROPOSAL OF EXTENSION

With reference to the letter from the Ministry of Oil and Energy, dated 05.11.2015 and reference number 15/1456, with an invitation to respond to the proposal for APA2016, including extension of the acreage.

Below are KUFPEC Norway AS' (KNAS) comments to the proposal.

As a relative new company on the Norwegian Continental Shelf, and with a long term plan and ambition to grow, it is very important that there is a continuous process of opening new acreage through the established licensing round system.

KNAS is satisified with the system of Awards in Predefined Areas, where it for APA2016 is proposed extensions of the acreage in the Norwegian Sea and the Barents Sea. KNAS supports the proposal of extension, but recommends that it is considered to include even more blocks, especially in the Barents Sea.

Especially the blocks north-northeast of todays APA-acreage, towards 73 degree N and between meridian 21 and 29 degrees E, could be considered included in APA2016. This area has been explored over several years already, and has good data coverage. In this respect, it is natural to consider this as part of the APA-acreage. KNAS has mapped leads into this acreage as a natural extension of the APA2015 efforts and would welcome the possibility to efficiently explore this region in a cost-efficient manner.

By including these areas, it is possible to accelerate the activity, which again can contribute to the discovery of new resources and eventually cost-sharing for any infrastructure required in the area.

Very best regards

Konstantinos Makrygiannis Acting Country Manager

KUFPEC Norway AS