Comment for planning application WSCC/046/23

Application number	WSCC/046/23
Name	Kathy Smyth, Director, Prote
Address	Protect Dunsfold Ltd The Sun Inn Flat The Common Dunsfold Surrey GU8 4LE
Type of Comment	Objection
Comments	Please see letter from Protect Dunsfold Ltd and 3 attachments
Received	15/03/2024 14:24:49
Attachments	The following files have been uploaded: Protect_ Dunsfold_ letter_ toWSCCreBBMarch2024.pdf NSTA response to JH 05.02.2024.pdf OGA Letter to Jeremy Hunt.pdf 2022.pdf

COMPANY REGISTRATION NUMBER: 07055133

UKOG (234) LTD

REPORT AND FINANCIAL STATEMENTS

Year ended 30 September 2022

UKOG (234) LTD
REPORT AND FINANCIAL STATEMENTS
Year ended 30 September 2022

Contents

UKOG (234) LTD
REPORT AND FINANCIAL STATEMENTS
COMPANY INFORMATION

Directors

Stephen Sanderson
Kiran Morzaria (Resigned 10 May 2023)
Alan Dee Howard (Appointed 10 May 2023)

Registered office

The Broadgate Tower 8th Floor
20 Primrose Street
London
EC2A 2EW

Registered number

07055133

UKOG (234) LTD
STRATEGIC REPORT

The directors present their strategic report for the year ended 30 September 2022.

Principal activities

The principal activity of UKOG (234) Ltd ("the company") is the investment in onshore oil and gas development and production opportunities in the United Kingdom.

The company is a member of the UK Oil & Gas Plc Group ("the Group"). The Group specialises in investing in new geological ideas, concepts and methodologies to find and produce oil & gas from previously unexplored rock formations within established oil-producing basins. The Group is also pursuing a hydrogen ready gas storage project.

Business review

The loss for the year after taxation was £323,100 (2021: £363,556). The directors do not recommend payment of a dividend (2021: £nil).

The company currently has a 100% interest in the PEDL234 licence in the South of England.

Post period, UKOG received outstanding news about our 100%-owned gas appraisal project at Loxley in Surrey. In February we received a Competent Person's Report (CPR) by RPS Energy (RPS) illustrating the potential material economic value of the Loxley gas discovery, located 9 miles south of Guildford in Surrey.

The CPR assigned a post-tax present value at a 10% annual discount rate of Loxley's 2C recoverable gas ranges of £123.7 million net to UKOG, assuming a gas price of £1.86/therm, the UK gas price on 31st December 2022, the effective date of the CPR, and £86.5 million net to UKOG utilising RPS' proprietary gas price forecast.

UKOG's net share of Loxley's 2C Contingent Resources is now estimated at 31 billion cubic feet (approximately 1 billion cubic metres) within the PEDL234 licence. Planning and environmental consents are in place for the proposed Loxley-1 appraisal programme.

The CPR confirms that Loxley, one of the UK's largest onshore gas discoveries, possesses material present value in today's prevailing higher gas price world. Its potential future revenue streams have the capacity to deliver material shareholder value in the foreseeable future and its recoverable resources to contribute towards the UK's future energy security.

Delivery of a successful Loxley-1 appraisal programme, currently planned for 2024, could further help cement this value in the foreseeable future.

In October last year, the High Court rejected legal challenges against the Secretary of State's decision to grant planning permission for Loxley, so planning consent remains in full force and the Company's plans to implement the project remain unchanged.

This follows the decision in June last year by the Right Hon Stuart Andrew MP, Minister for Housing acting for the Secretary of State for Levelling Up, Housing and Communities, to overturn Surrey County Council's refusal of planning consent.

It is the Company's and its legal counsel's view that, whilst further challenges by either claimant are to be expected, the emphatic rulings of both the SoS and the High Court make the likelihood of their success doubtful. In any case, the Company will continue to rigorously defend its position in any subsequent action as and when it may occur.

It is worth noting that the Environment Agency, the body responsible for safeguarding the UK's environment, granted UKOG a full environmental permit covering all aspects of the Loxley operation back in June 2020.

An initial grid export study has been completed with network operator SGN for Loxley gas entry into the 38 bar Local Transmission System confirming a route for Loxley gas sales for a range between 10-30 MMscfd. A detailed pipeline routing study to the identified grid entry point will now be undertaken. Gas processing and facility cost studies have been completed with consultant IMB Net Zero to provide up to date project development CAPEX estimates.

Work has commenced to discharge planning conditions for Loxley after which site construction plans can proceed. It is anticipated that site construction will commence in the second half of 2023, with the drilling of Loxley-1 to follow in 2024.

The Company's application for a two-year planning permission extension to West Sussex County Council's Planning Committee for its Broadford Bridge-1/1z Kimmeridge oil discovery was approved. Commercial discussions continue with CeraPhi Energy regarding potential for a geothermal project incorporating the Broadford Bridge asset.

Principal risks and uncertainties of the company

From the perspective of the company, the principal risks and uncertainties are so integrated with the principal risks and uncertainties of the Group that they are not managed separately. Accordingly, the principal risks and uncertainties of the UK Oil & Gas Group, which include those of the company, are discussed below.

The principal risks and uncertainties facing the Group are continuously monitored and reported to the board of directors ("the Board") on a regular basis. The Board reviews these risks and focuses on ensuring that effective systems of internal financial and non-financial controls are in place and monitored.

The Group's principal financial instruments are available for sale assets, trade receivables, trade payables and cash at bank, and borrowings. The main purpose of these financial instruments is to fund the Group's operations.

It is, and has been throughout the period under review, the Group's policy that no trading in financial instruments shall be undertaken. The main risk arising from the Group's financial instruments is liquidity risk.

Liquidity risk is the risk that the Group will encounter difficulty in meeting its financial obligations as they fall due. The UK Oil & Gas Group's objective is to maintain a balance between continuity of funding and flexibility through the use of equity and its cash resources.

Exploration risk is the risk that the Group's investee companies fail to locate and explore hydrocarbon bearing prospects that have the potential to deliver commercially, e.g. key wells are dry or less successful than anticipated. This is managed through the analysis of available technical information to determine work programme. Risk sharing arrangements are entered into to reduce downside risk.

Permitting risk is the risk that the Group encounters issues and delays related to planning, environmental, licensing and other permitting activities which delay investee operations, particularly with exploration drilling operations.

Key performance indicators ("KPIs")

Due to the current status of the Group, the Board has not identified any performance indicators as key.

Signed on behalf of the Board by:

[redacted]

Stephen Sanderson

Director

14 June 2023

UKOG (234) LTD
DIRECTORS REPORT

The directors present their report and the financial statements for the period ended 30 September 2022.

Results and dividends

The loss for the year after taxation was £323,100 (2021: £363,556). The directors do not recommend payment of a dividend (2021: £nil).

The company has received assurance from its ultimate parent company that it will continue to receive financial support for a period of at least 12 months from the signing of the accounts in order to meet its obligations as they fall due.

Directors of the company

The directors who held office during the period were:

Stephen Sanderson
Kiran Morzaria

Charitable and political donations

The company made no political or charitable donations during the year (2021: £nil).

Audit exemption

For the period ended 30 September 2022 the company was entitled to exemption from audit under section 479A of the Companies Act 2006 relating to subsidiary companies.

Directors responsibilities:

- The members have not required the company to obtain an audit of its accounts for the year in question in accordance with section 476
- The directors acknowledge their responsibilities for complying with the requirements of the Act with respect to accounting records and the preparation of the accounts

Signed on behalf of the Board by:

[redacted]

Stephen Sanderson
Director

14 June 2023

UKOG (234) LTD
STATEMENT OF DIRECTORS' RESPONSIBILITIES

The directors are responsible for preparing the Strategic Report, the Director's Report and the financial statements in accordance with applicable law and regulations.

Company law requires the directors to prepare financial statements for each financial year. Under that law the directors have elected to prepare the financial statements in accordance with United Kingdom Accounting Standards (United Kingdom Generally Accepted Accounting Practice), including FRS 101 'Reduced Disclosure Framework' ('FRS 101'). Under company law the directors must not approve the financial statements unless he is satisfied that they give a true and fair view of the state of affairs of the company and of the profit or loss of the company for that period. In preparing these financial statements, the directors are required to:

• select suitable accounting policies and apply them consistently;

• make judgements and accounting estimates that are reasonable and prudent;

• state whether applicable UK Accounting Standards have been followed, subject to any material departures disclosed and explained in the financial statements; and

• prepare the financial statements on the going concern basis unless it is inappropriate to presume that the company will continue in business.

The directors are responsible for keeping adequate accounting records that are sufficient to show and explain the company's transactions and disclose with reasonable accuracy at any time the financial position of the company and enable them to ensure that the financial statements comply with the Companies Act 2006. They are also responsible for safeguarding the assets of the company and hence for taking reasonable steps for the prevention and detection of fraud and other irregularities.

UKOG (234) LTD
STATEMENT OF COMPREHENSIVE INCOME
YEAR ENDED 30 SEPTEMBER 2022

	Note	2022	2021
		£	£
Turnover		-	-
Cost of Sales		-	-
Gross profit / (loss)		-	-
Administrative expenses		(323,100)	(363,556)
Operating profit / (loss)	4	(323,100)	(363,556)
Exploration write off	7	-	-
Interest payable		-	-
Profit / (loss) before taxation		(323,100)	(363,556)
Taxation	6	-	-
Profit / (loss) for the year		(323,100)	(363,556)
Other comprehensive income		-	
Total comprehensive income / (loss)		(323,100)	(363,556)

The company's results are derived from continuing operations.

The notes on page 9 to 21 form part of these financial statements

UKOG (234) LTD
STATEMENT OF FINANCIAL POSITION
30 SEPTEMBER 2022

	Note	2022	2021
		£	£
Long term assets			
Exploration and evaluation assets	7	8,275,738	8,109,345
Tangible assets	8	-	-
Decommissioning asset		-	95,093
		8,275,738	8,204,438
Current assets			
Debtors	9	51,361	117,423
Creditors: amounts falling due within one year	10	(26,562)	(267,223)
Net current liabilities		24,799	(149,799)
Total assets less current liabilities		8,300,536	8,054,639
Creditors: amounts falling due after one year	11	(8,485,337)	(8,043,979)
Provisions for liabilities		(1,013,619)	(885,979)
Total net liabilities		(1,198,421)	(875,320)
Capital and reserves			
Called up share capital	12	1	1
Profit and loss account		(1,198,420)	(875,321)
Shareholders' funds		(1,198,421)	(875,320)

- For the period ended 30 September 2022 the company was entitled to exemption under section 479A of the Companies Act 2006 relating to subsidiary companies.
- The members have not required the company to obtain an audit in accordance with section 476 of the Companies Act 2006
- The directors acknowledge their responsibilities for complying with the requirements of the Act with respect to accounting period and the preparation of the accounts.

[redacted]ved by the Board on 14 June 2023, and signed on its behalf by:

....

Stephen Sanderson

Director

Registered number: 07055133

The notes on pages 9 to 21 form part of these financial statements

UKOG (234) LTD
STATEMENT OF CHANGES IN EQUITY
YEAR ENDED 30 SEPTEMBER 2022

	Share capital	Profit and loss account	Total
	£	£	£
At 1 October 2020	7,552,555	(14,305,698)	(6,753,143)
Loss for the year	-	(363,556)	(363,556)
Other comprehensive income	-	-	-
Total comprehensive income	-	(363,556)	(363,556)
Capital reorganisation	(7,552,554)	13,793,934	6,241,380
At 30 September 2021	1	(875,320)	(875,321)

	Share capital	Profit and loss account	Total
	£	£	£
At 1 October 2021	1	(875,320)	(875,321)
Loss for the year	-	(323,100)	(323,100)
Other comprehensive income	-	-	-
Total comprehensive income	-	(323,100)	(323,100)
Capital reorganisation	-	-	-
At 30 September 2022	1	(1,198,420)	(1,1198,421)

The notes on pages 9 to 21 form part of these financial statements

1 General information

UKOG (234) Ltd (the "company") holds interests in onshore Petroleum, Exploration and Development Licences in the United Kingdom. The company is a private company and is incorporated and domiciled in England and Wales. The address of its registered office is The Broadgate Tower 8th Floor, 20 Primrose Street, London, EC2A 2EW.

2 Authorisation of financial statements and statement of compliance with FRS 101

The financial statements of UKOG the company for the year ended 30 September 2022 were authorised for issue by the board of directors on 14 June 2023 and the balance sheet was signed on the board's behalf by Stephen Sanderson.

These financial statements were prepared in accordance with Financial Reporting Standard 101 'Reduced Disclosure Framework' ('FRS 101') and in accordance with applicable accounting standards.

3 Accounting policies

The following accounting policies have been consistently applied in deciding the items which are considered material in relation to the financial statements.

Basis of preparation

The company has been determined to meet the criteria of a 'qualifying entity' under the definition in FRS 101. The financial statements in which the company is consolidated are available from the ultimate parent company as detailed in note 14.

The accounting policies which follow set out those policies which apply in preparing the financial statements for the period ended 30 September 2022.

Summary of disclosure exemptions

The company has taken advantage of the following disclosure exemptions under FRS 101:

• the requirements of paragraphs 45(b) and 46-52 of IFRS 2 Share based Payment, because the share based payment arrangement concerns the instruments of another group entity;

• the requirements of IFRS 7 Financial Instruments: Disclosures,

• the requirements of paragraphs 91-99 of IFRS 13 Fair Value Measurement,

• the requirement in paragraph 38 of IAS 1 'Presentation of Financial Statements' to present comparative information in respect of:

(i) paragraph 79(a)(iv) of IAS 1;

(ii) paragraph 73(e) of IAS 16 Property, Plant and Equipment;

(iii) paragraph 118(e) of IAS 38 Intangible Assets;

• the requirements of paragraphs 10(d), 10(f), 39(c) and 134-136 of IAS 1 Presentation of Financial Statements;

• the requirements of IAS 7 Statement of Cash Flows;

• the requirements of paragraphs 30 and 31 of IAS 8 Accounting Policies, Changes in Accounting Estimates and Errors;

• the requirements of paragraph 17 of IAS 24 Related Party Disclosures;

• the requirements in IAS 24 Related Party Disclosures to disclose related party transactions entered into between two or more members of a group, provided that any subsidiary which is a party to the transaction is wholly owned by such a member ; and

• the requirements of paragraphs 134(d)-134(f) and 135(c)-135(e) of IAS 36 Impairment of Assets.

3 Accounting policies *(continued)*

New and Amended Standards and Interpretations
The UK Oil & Gas Plc group adopted the following new and amended IFRSs for the first time for the reporting period commencing 1 October 2020:

- Amendments to IAS 1 and IAS 8: Definition of material
- Amendments to References to the Conceptual Framework in IFRS Standards

There is no material impact on the financial statements following the adoption of these new standards and interpretations.

Going concern

The Directors noted the losses that the company made for the year ended 30 September 2022, and its net liability position. The company is reliant on the continued financial support of its parent company UK Oil and Gas Plc ("UKOG") for its working capital. UKOG has provided the company with an undertaking that for at least 12 months from the date of approval of these financial statements, it will continue to make available such funds as are needed by the company, and in particular will not seek repayment of the amounts already provided. The directors are satisfied with the ability of UKOG to meet this undertaking.

The cost structure of the Company comprises a high proportion of discretionary spend and therefore in the event that cash flows become constrained, costs can be quickly reduced to enable the Company to operate within its available funding. Accordingly, the financial statements have been prepared on a going concern basis.

Exploration & Evaluation assets
Oil and natural gas exploration, evaluation and development expenditure is accounted for using the successful efforts method of accounting.

(i) Pre-licence costs
Pre-licence costs are expensed in the period in which they are incurred.

(ii) Licence and property acquisition costs
Exploration licence and leasehold property acquisition costs are capitalised in intangible assets. Licence costs paid in connection with a right to explore in an existing exploration area are capitalised and amortised over the term of the permit.

Licence and property acquisition costs are reviewed at each reporting date to confirm that there is no indication that the carrying amount exceeds the recoverable amount. This review includes confirming that exploration drilling is still under way or firmly planned, or that it has been determined, or work is under way to determine that the discovery is economically viable based on a range of technical and commercial considerations and that sufficient progress is being made on establishing development plans and timing.

3 Accounting policies *(continued)*

If no future activity is planned or the licence has been relinquished or has expired, the carrying value of the licence and property acquisition costs are written off through the statement of profit or loss and other comprehensive income. Upon recognition of proved reserves and internal approval for development, the relevant expenditure is transferred to oil and gas properties.

(iii) Exploration and evaluation costs
Exploration and evaluation activity involves the search for hydrocarbon resources, the determination of technical feasibility and the assessment of commercial viability of an identified resource.

Once the legal right to explore has been acquired, costs directly associated with an exploration well are capitalised as exploration and evaluation intangible assets until the drilling of the well is complete and the results have been evaluated. These costs include directly attributable employee remuneration, materials and fuel used, rig costs and payments made to contractors.

If no potentially commercial hydrocarbons are discovered, the exploration asset is written off through the statement of profit or loss and other comprehensive income as a dry hole. If extractable hydrocarbons are found and, subject to further appraisal activity (e.g., the drilling of additional wells), it is probable that they can be commercially developed, the costs continue to be carried as an intangible asset while sufficient/continued progress is made in assessing the commerciality of the hydrocarbons. Costs directly associated with appraisal activity undertaken to determine the size, characteristics and commercial potential of a reservoir following the initial discovery of hydrocarbons, including the costs of appraisal wells where hydrocarbons were not found, are initially capitalised as an intangible asset.

All such capitalised costs are subject to technical, commercial and management review, as well as review for indicators of impairment at least once a year. This is to confirm the continued intent to develop or otherwise extract value from the discovery. When this is no longer the case, the costs are written off through the statement of profit or loss and other comprehensive income.

When proved reserves of oil and natural gas are identified and development is sanctioned by management, the relevant capitalised expenditure is first assessed for impairment and (if required) any impairment loss is recognised, then the remaining balance is transferred to oil and gas properties. Other than licence costs, no amortisation is charged during the exploration and evaluation phase.

(iv) Development costs
Expenditure on the construction, installation or completion of infrastructure facilities such as platforms, pipelines and the drilling of development wells, including unsuccessful development or delineation wells, is capitalised within oil and gas properties.

Oil and gas properties and other property, plant and equipment

(i) Initial recognition
Oil and gas properties and other property, plant and equipment are stated at cost, less accumulated depreciation and accumulated impairment losses.

The initial cost of an asset comprises its purchase price or construction cost, any costs directly attributable to bringing the asset into operation, the initial estimate of the decommissioning obligation and, for qualifying assets (where relevant), borrowing costs. The purchase price or construction cost is the aggregate amount paid and the fair value of any other consideration given to acquire the asset. The capitalised value of a finance lease is also included within property, plant and equipment.

3 Accounting policies *(continued)*

When a development project moves into the production stage, the capitalisation of certain construction/development costs ceases, and costs are either regarded as part of the cost of inventory or expensed, except for costs which qualify for capitalisation relating to oil and gas property asset additions, improvements or new developments.

(ii) Depreciation/amortisation
Oil and gas properties are depreciated/amortised on a unit-of-production basis over the total proved developed and undeveloped reserves of the field concerned, except in the case of assets whose useful life is shorter than the lifetime of the field, in which case the straight-line method is applied. Rights and concessions are depleted on the unit-of-production basis over the total proved developed and undeveloped reserves of the relevant area. The unit-of-production rate calculation for the depreciation/amortisation of field development costs takes into account expenditures incurred to date, together with sanctioned future development expenditure. Other property, plant and equipment are generally depreciated on a straight-line basis over their estimated useful lives, which is generally 20 years for refineries, and major inspection costs are amortised over three to five years, which represents the estimated period before the next planned major inspection. Property, plant and equipment held under finance leases are depreciated over the shorter of lease term and estimated useful life. An item of property, plant and equipment and any significant part initially recognised is derecognised upon disposal or when no future economic benefits are expected from its use or disposal. Any gain or loss arising on derecognition of the asset (calculated as the difference between the net disposal proceeds and the carrying amount of the asset) is included in the statement of profit or loss and other comprehensive income when the asset is derecognised. The asset's residual values, useful lives and methods of depreciation/amortisation are reviewed at each reporting period and adjusted prospectively, if appropriate.

(ii) Major maintenance, inspection and repairs
Expenditure on major maintenance refits, inspections or repairs comprises the cost of replacement assets or parts of assets, inspection costs and overhaul costs. Where an asset, or part of an asset that was separately depreciated and is now written off is replaced and it is probable that future economic benefits associated with the item will flow to the company, the expenditure is capitalised. Where part of the asset replaced was not separately considered as a component and therefore not depreciated separately, the replacement value is used to estimate the carrying amount of the replaced asset(s) and is immediately written off. Inspection costs associated with major maintenance programmes are capitalised and amortised over the period to the next inspection. All other day-to-day repairs and maintenance costs are expensed as incurred.

Provision for rehabilitation / decommissioning liability
The company recognises a decommissioning liability where it has a present legal or constructive obligation as a result of past events, and it is probable that an outflow of resources will be required to settle the obligation, and a reliable estimate of the amount of obligation can be made.

The obligation generally arises when the asset is installed, or the ground/environment is disturbed at the field location. When the liability is initially recognised, the present value of the estimated costs is capitalised by increasing the carrying amount of the related oil and gas assets to the extent that it was incurred by the development/construction of the field. Any decommissioning obligations that arise through the production of inventory are expensed when the inventory item is recognised in cost of goods sold.

Changes in the estimated timing or cost of decommissioning are dealt with prospectively by recording an adjustment to the provision and a corresponding adjustment to oil and gas assets.

Any reduction in the decommissioning liability and, therefore, any deduction from the asset to which it relates, may not exceed the carrying amount of that asset. If it does, any excess over the carrying value is taken immediately to the statement of profit or loss and other comprehensive income.

3 Accounting policies *(continued)*

If the change in estimate results in an increase in the decommissioning liability and, therefore, an addition to the carrying value of the asset, the company considers whether this is an indication of impairment of the asset as a whole, and if so, tests for impairment. If, for mature fields, the estimate for the revised value of oil and gas assets net of decommissioning provisions exceeds the recoverable value, that portion of the increase is charged directly to expense. Over time, the discounted liability is increased for the change in present value based on the discount rate that reflects current market assessments and the risks specific to the liability. The periodic unwinding of the discount is recognised in the statement of profit or loss and other comprehensive income as a finance cost. The company recognises neither the deferred tax asset in respect of the temporary difference on the decommissioning liability nor the corresponding deferred tax liability in respect of the temporary difference on a decommissioning asset.

Taxation

Current tax is the tax currently payable based on taxable profit for the year.

Deferred income taxes are calculated using the liability method on temporary differences. Deferred tax is generally provided on the difference between the carrying amounts of assets and liabilities and their tax bases. However, deferred tax is not provided on the initial recognition of goodwill, nor on the initial recognition of an asset or liability unless the related transaction is a business combination or affects tax or accounting profit. Deferred tax on temporary differences associated with shares in subsidiaries and joint ventures is not provided if reversal of these temporary differences can be controlled by the Company and it is probable that reversal will not occur in the foreseeable future. In addition, tax losses available to be carried forward as well as other income tax credits to the Company are assessed for recognition as deferred tax assets.

Deferred tax liabilities are provided in full, with no discounting. Deferred tax assets are recognised to the extent that it is probable that the underlying deductible temporary differences will be able to be offset against future taxable income. Current and deferred tax assets and liabilities are calculated at tax rates that are expected to apply to their respective period of realisation, provided they are enacted or substantively enacted at the balance sheet date.

Changes in deferred tax assets or liabilities are recognised as a component of tax expense in the income statement, except where they relate to items that are charged or credited directly to equity in which case the related deferred tax is also charged or credited directly to equity.

Financial Assets

Financial assets are divided into the following categories: loans and receivables and available-for-sale financial assets. Financial assets are assigned to the different categories by management on initial recognition, depending on the purpose for which they were acquired, and are recognised when the company becomes party to contractual arrangements. Both loans and receivables and available for sale financial assets are initially recorded at fair value.

Loans and receivables are non-derivative financial assets with fixed or determinable payments that are not quoted in an active market. Trade, most other receivables and cash and cash equivalents fall into this category of financial assets. Loans and receivables are measured subsequent to initial recognition at amortised cost using the effective interest method, less provision for impairment. Any change in their value through impairment or reversal of impairment is recognised in the income statement.

Provision against trade receivables is made when there is objective evidence that the company will not be able to collect all amounts due to it in accordance with the original terms of those receivables. The amount of the write-down is determined as the difference between the asset's carrying amount and the present value of estimated future cash flows.

3 Accounting policies *(continued)*

A financial asset is derecognised only where the contractual rights to the cash flows from the asset expire or the financial asset is transferred, and that transfer qualifies for derecognition. A financial asset is transferred if the contractual rights to receive the cash flows of the asset have been transferred or the company retains the contractual rights to receive the cash flows of the asset but assumes a contractual obligation to pay the cash flows to one or more recipients. A financial asset that is transferred qualifies for derecognition if the company transfers substantially all the risks and rewards of ownership of the asset, or if the company neither retains nor transfers substantially all the risks and rewards of ownership but does transfer control of that asset.

Derivative instruments are recorded at cost and adjust for their market value as applicable. They are assessed for any equity and debt component which is subsequently accounted for in accordance with IFRS's.

Financial Liabilities

Financial liabilities are obligations to pay cash or other financial assets and are recognised when the company becomes a party to the contractual provisions of the instrument.

All financial liabilities initially recognised at fair value less transaction costs and thereafter carried at amortised cost using the effective interest method, with interest-related charges recognised as an expense in finance cost in the income statement. A financial liability is derecognised only when the obligation is extinguished, that is, when the obligation is discharged or cancelled or expires.

Cash and Cash Equivalents

Cash and cash equivalents comprise cash on hand and demand deposits, together with other short-term, highly liquid investments that are readily convertible into known amounts of cash and which are subject to an insignificant risk of changes in value.

Foreign Currencies

Transactions in foreign currencies are translated at the exchange rate ruling at the date of the transaction. Monetary assets and liabilities in foreign currencies are translated at the rates of exchange ruling at the balance sheet date. Non-monetary items that are measured at historical cost in a foreign currency are translated at the exchange rate at the date of the transaction. Non-monetary items that are measured at fair value in a foreign currency are translated using the exchange rates at the date when the fair value was determined. Any exchange differences arising on the settlement of monetary items or on translating monetary items at rates different from those at which they were initially recorded are recognised in the profit or loss in the period in which they arise. Exchange differences on non-monetary items are recognised in other comprehensive income to the extent that they relate to a gain or loss on that non-monetary item taken to other comprehensive income, otherwise such gains and losses are recognised in the income statement.

The company's functional currency and presentational currency is Sterling.

Significant accounting judgements, estimates and assumptions

The preparation of the company's consolidated financial statements requires management to make judgements, estimates and assumptions that affect the reported amounts of revenues, expenses, assets and liabilities, and the accompanying disclosures, and the disclosure of contingent liabilities at the date of the consolidated financial statements. Estimates and assumptions are continuously evaluated and are based on management's experience and other factors, including expectations of future events that are believed to be reasonable under the circumstances. Uncertainty about these assumptions and estimates could result in outcomes that require a material adjustment to the carrying amount of assets or liabilities affected in future periods.

3 Accounting policies *(continued)*

In particular, the company has identified the following areas where significant judgements, estimates and assumptions are required. Further information on each of these areas and how they impact the various accounting policies are described below and also in the relevant notes to the financial statements.
Changes in estimates are accounted for prospectively.

(i) Judgements

In the process of applying the company's accounting policies, management has made the following judgements, which have the most significant effect on the amounts recognised in the consolidated financial statements:

(a) Contingencies

Contingent liabilities may arise from the ordinary course of business in relation to claims against the company, including legal, contractor, land access and other claims. By their nature, contingencies will be resolved only when one or more uncertain future events occur or fail to occur. The assessment of the existence, and potential quantum, of contingencies inherently involves the exercise of significant judgement and the use of estimates regarding the outcome of future events.

(ii) Estimates and assumptions

The key assumptions concerning the future and other key sources of estimation uncertainty at the reporting date that have a significant risk of causing a material adjustment to the carrying amounts of assets and liabilities within the next financial year, are described below. The company based its assumptions and estimates on parameters available when the consolidated financial statements were prepared. Existing circumstances and assumptions about future developments, however, may change due to market change or circumstances arising beyond the control of the company. Such changes are reflected in the assumptions when they occur.

(a) Hydrocarbon reserve and resource estimates

Hydrocarbon reserves are estimates of the amount of hydrocarbons that can be economically and legally extracted from the company's oil and gas properties. The company estimates its commercial reserves and resources based on information compiled by appropriately qualified persons relating to the geological and technical data on the size, depth, shape and grade of the hydrocarbon body and suitable production techniques and recovery rates. Commercial reserves are determined using estimates of oil and gas in place, recovery factors and future commodity prices, the latter having an impact on the total amount of recoverable reserves and the proportion of the gross reserves which are attributable to the host government under the terms of the Production-Sharing Agreements. Future development costs are estimated using assumptions as to the number of wells required to produce the commercial reserves, the cost of such wells and associated production facilities, and other capital costs. The current long-term Brent oil price assumption used in the estimation of commercial reserves is US$80/bbl.

The company estimates and reports hydrocarbon reserves in line with the principles contained in the SPE Petroleum Resources Management Reporting System (PRMS) framework. As the economic assumptions used may change and as additional geological information is obtained during the operation of a field, estimates of recoverable reserves may change. Such changes may impact the company's reported financial position and results, which include:

- The carrying value of exploration and evaluation assets; oil and gas properties; property, plant and equipment; and goodwill may be affected due to changes in estimated future cash flows
- Depreciation and amortisation charges in the statement of profit or loss and other comprehensive income may change where such charges are determined using the Units of Production (UOP) method, or where the useful life of the related assets change
- Provisions for decommissioning may require revision — where changes to the reserve estimates affect expectations about when such activities will occur and the associated cost of these activities

3 Accounting policies *(continued)*

- The recognition and carrying value of deferred tax assets may change due to changes in the judgements regarding the existence of such assets and in estimates of the likely recovery of such assets

(b) Exploration and evaluation expenditures

The application of the company's accounting policy for exploration and evaluation expenditure requires judgement to determine whether future economic benefits are likely, from future either exploitation or sale, or whether activities have not reached a stage which permits a reasonable assessment of the existence of reserves. The determination of reserves and resources is itself an estimation process that involves varying degrees of uncertainty depending on how the resources are classified. These estimates directly impact when the company defers exploration and evaluation expenditure. The deferral policy requires management to make certain estimates and assumptions about future events and circumstances, in particular, whether an economically viable extraction operation can be established. Any such estimates and assumptions may change as new information becomes available. If, after expenditure is capitalised, information becomes available suggesting that the recovery of the expenditure is unlikely, the relevant capitalised amount is written off in the statement of profit or loss and other comprehensive income in the period when the new information becomes available.

(c) Units of production (UOP) depreciation of oil and gas assets

Oil and gas properties are depreciated using the UOP method over total proved developed and undeveloped hydrocarbon reserves. This results in a depreciation/amortisation charge proportional to the depletion of the anticipated remaining production from the field.

The life of each item, which is assessed at least annually, has regard to both its physical life limitations and present assessments of economically recoverable reserves of the field at which the asset is located. These calculations require the use of estimates and assumptions, including the amount of recoverable reserves and estimates of future capital expenditure.

The calculation of the UOP rate of depreciation/amortisation will be impacted to the extent that actual production in the future is different from current forecast production based on total proved reserves, or future capital expenditure estimates change. Changes to proved reserves could arise due to changes in the factors or assumptions used in estimating reserves, including:

- The effect on proved reserves of differences between actual commodity prices and commodity price assumptions
- Unforeseen operational issues

(d) Recoverability of oil and gas assets

The company assesses each asset or cash generating unit (CGU) (excluding goodwill, which is assessed annually regardless of indicators) each reporting period to determine whether any indication of impairment exists. Where an indicator of impairment exists, a formal estimate of the recoverable amount is made, which is considered to be the higher of the fair value less costs of disposal (FVLCD) and value in use (VIU). The assessments require the use of estimates and assumptions such as long-term oil prices (considering current and historical prices, price trends and related factors), discount rates, operating costs, future capital requirements, decommissioning costs, exploration potential, reserves (see (a) *Hydrocarbon reserves and resource estimates* above) and operating performance (which includes production and sales volumes). These estimates and assumptions are subject to risk and uncertainty. Therefore, there is a possibility that changes in circumstances will impact these projections, which may impact the recoverable amount of assets and/or CGUs.

3 Accounting policies *(continued)*

(e) Decommissioning costs

Decommissioning costs will be incurred by the company at the end of the operating life of some of the company's facilities and properties. The company assesses its decommissioning provision at each reporting date. The ultimate decommissioning costs are uncertain and cost estimates can vary in response to many factors, including changes to relevant legal requirements, the emergence of new restoration techniques or experience at other production sites. The expected timing, extent and amount of expenditure may also change — for example, in response to changes in reserves or changes in laws and regulations or their interpretation.

Therefore, significant estimates and assumptions are made in determining the provision for decommissioning. As a result, there could be significant adjustments to the provisions established which would affect future financial results.

External valuers may be used to assist with the assessment of future decommissioning costs. The involvement of external valuers is determined on a case by case basis, taking into account factors such as the expected gross cost or timing of abandonment, and is approved by the company's director. Selection criteria include market knowledge, reputation, independence and whether professional standards are maintained. The provision at reporting date represents management's best estimate of the present value of the future decommissioning costs required

(f) Fair value measurement

The company measures financial instruments, such as derivatives, at fair value at each balance sheet date. From time to time, the fair values of non-financial assets and liabilities are required to be determined, e.g., when the entity acquires a business, or where an entity measures the recoverable amount of an asset or cash-generating unit (CGU) at FVLCD.

Fair value is the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants at the measurement date.
The fair value of an asset or a liability is measured using the assumptions that market participants would use when pricing the asset or liability, assuming that market participants act in their economic best interest.

A fair value measurement of a non-financial asset takes into account a market participant's ability to generate economic benefits by using the asset in its highest and best use or by selling it to another market participant that would use the asset in its highest and best use.

The company uses valuation techniques that are appropriate in the circumstances and for which sufficient data are available to measure fair value, maximising the use of relevant observable inputs and minimising the use of unobservable inputs. From time to time external valuers are used to assess FVLCD of the company's non-financial assets. Involvement of external valuers is decided upon by the valuation committee after discussion with and approval by the company's director. Selection criteria include market knowledge, reputation, independence and whether professional standards are maintained. Valuers are normally rotated every three years. The valuation committee decides, after discussions with the company's external valuers, which valuation techniques and inputs to use for each case.

Changes in estimates and assumptions about these inputs could affect the reported fair value.

UKOG (234) LTD
NOTES TO THE FINANCIAL STATEMENTS (continued)
YEAR ENDED 30 SEPTEMBER 2022

3 Accounting policies *(continued)*

(g) Taxation

Income tax expense is comprised of the sum of current tax expense (or benefit) plus the change in deferred tax liabilities and assets during the period, except for current and deferred income tax relating to items recognised in the Profit and Loss and Statement of Other Comprehensive Income, in which case the tax is also recognised in the Statement of Other Comprehensive Income.

Current tax assets and liabilities are measured at the amount expected to be recovered from or paid to the taxation authorities. The tax rates and tax laws used to compute the amount are those that are enacted or substantively enacted by the end of the reporting period.

Deferred tax assets and liabilities are calculated using the liability method for all temporary differences between the carrying amount of assets and liabilities in the financial statements and for tax purposes, including tax losses carried forward.

The carrying amount of deferred tax assets is reviewed at the end of each reporting period and reduced to the extent it is no longer probable that estimated future taxable profit will be sufficient to recover all or part of the deferred tax asset. Unrecognised deferred tax assets are reassessed at the end of each reporting period and are recognised to the extent it has become probable that estimated future taxable profit is sufficient to recover the deferred tax asset. The probability assessment is based on management's judgment and estimates of future taxable income, including the estimated effect of tax planning opportunities.

Deferred tax assets and liabilities are measured at the tax rates that are expected to apply in the estimated year of realisation or settlement, based on tax rates (and tax laws) that have been enacted or substantively enacted by the end of the reporting period.

Deferred tax assets and deferred tax liabilities are offset, if a legally enforceable right exists to set off current tax assets against current tax liabilities and the deferred taxes are related to the same taxable entity and the same taxation authority.

4 Operating profit / (loss)	**2022**	**2021**
	£	**£**
Arrived at after charging / (crediting):		
Depreciation, Depletion & Amortisation	(95,093)	(203,107)

5 Directors' remuneration

	2022	**2021**
Salary & Fees:	**£**	**£**
K Morzaria	-	-
S Sanderson	-	-
	-	-

6 Taxation	**2022**	**2021**
	£	**£**
(a) Analysis of tax charged / (credited)		
Current taxation		
UK corporation tax	-	-
Total current income tax	**-**	**-**
Deferred taxation		
Current year (credit) / charge	-	-
Adjustments to the estimated recoverable amounts of deferred tax assets arising in previous periods	-	-
Total deferred taxation	-	-

(b) Factors affecting current tax charge / (credit)

The tax on loss before tax for the year differs from the standard rate of corporation tax in the UK of 19% (2020 – 19%). The differences are reconciled below:

	2022	**2021**
	£	**£**
Profit / (loss) before tax	(323,100)	(363,556)
Corporation tax at standard rate	(43,321)	(69,076)
Expenses not deductible for tax purposes	-	-
Losses carried forward	43,321	69,076
Total tax charge / (credit)	**-**	**-**

7 Exploration and evaluation assets

	£
Cost	
At 01 October 2021	8,109,345
Additions	166,393
Exploration write off	-
At 30 September 2022	8,275,738
Deductions	-
Exploration write off	-
At 30 September 2022	8,275,738

The directors assessed the fair value of the exploration and evaluation assets as at 30 September 2022 and concluded that the company continues to assess the potential of the remaining assets and will continue to develop and evaluate these assets in the coming year. There was no material change to the Licence area during the period. The director therefore considers that no further impairment is required at 30 September 2022.

8 Tangible assets

	Property Plant & equipment £
Cost	
At 30 September 2020	560,984
Additions	-
At 30 September 2021	560,984
Additions	-
At 30 September 2022	560,984
Amortisation	
At 30 September 2020	548,062
Charge for the year	12,922
At 30 September 2021	560,984
Charge for the year	-
At 30 September 2022	560,984
Net book values	
At 30 September 2021	-
At 30 September 2022	-

9 Debtors

	2022 £	2021 £
Prepayments and accrued income	46,035	117,423
	46,035	117,423

10 Creditors: amounts falling due within one year

	2022 £	2021 £
Trade creditors	26,562	267,223
	26,562	267,233

11 Creditors: amounts falling due after one year

	2022 £	2021 £
Amounts payable to ultimate parent company	8,593,624	8,043,979

12 Share capital		**2022**		**2021**
Ordinary £1 shares	**Number**	**£**	**Number**	**£**
Authorised	1	1	1	1
Allotted, called up and paid up	1	1	1	1

13 Related party transactionss

As a wholly owned subsidiary of UK Oil & Gas Plc the company has taken advantage of the exemption under paragraph 8(k) of FRS101 not to disclose transactions with other wholly owned group companies. There were no other related party transactions.

14 Ultimate parent undertaking

The company's immediate, ultimate and controlling parent undertaking UK Oil & Gas PLC, a company incorporated in the United Kingdom.

The smallest and largest group in which the results of the company are consolidated is that headed by UK Oil & Gas Plc. These financial statements are available upon request from UK Oil & Gas Plc, 8th floor, Broadgate Tower, 20 Primrose Street, London, EC2A 2EW.

North Sea
Transition
Authority

2 Royal Parade
Tilford Road
Hindhead
Surrey
GU26 6TD

Email: huntj@parliament.uk

Date 5th February 2024

North Sea Transition Authority
3rd Floor
1 Marischal Square
Broad Street
Aberdeen
AB10 1LP
E: stuart.payne@nstauthority.co.uk
www.nstauthority.co.uk

Dear Jeremy

UKOG (234) Ltd ("UKOG") licence

Thank you for your email of 23 January 2024 in relation to UKOG and its activities under Petroleum Exploration and Development Licence (PEDL) 234 at Dunsfold, Surrey.

It may assist if I set out some background to the role of the North Sea Transition Authority ("NSTA") as a regulator for the onshore industry in England, to avoid confusion, please note that in some information quoted below our previous operating name "Oil and Gas Authority" or "OGA" is used.

The regulation of onshore activity in England involves a number of agencies including mineral planning authorities ("MPAs"), the Environment Agency and the Health & Safety Executive, each with different responsibilities. The role of the NSTA is to regulate *operational activity* under the PEDL by the granting of licences and consents to conduct certain activities under the terms of the PEDL. Financial assessments of the capability of licensees are conducted with reference to any *licensable activities* or events which the licensee may apply for consent to the NSTA.

Much onshore activity is regulated by the Town and Country Planning Act 1990 ("TCPA") which provides MPAs with the necessary powers to include conditions in planning permissions for the removal of plant and machinery from sites at the end of operations, and to ensure that the land is fully restored. Further powers are provided by the TCPA for MPAs to ensure that funding is available for these activities and to revisit permissions periodically to ensure that adequate controls are in place.

Minerals guidance also makes clear that concerns about funding should be addressed through planning conditions. Indeed, the current guidance states that the MPA is responsible for ensuring the wells are decommissioned and abandoned and the site is restored.[i] MPAs have in practice included appropriate conditions requiring well abandonment in planning permissions. The position nationwide with regard to securing funding for such activity is not consistent. However, Dorset County Council has secured in excess of £100 million for this purpose for the Wytch Farm oilfield.

The TCPA (together with other legislation and guidance) provides the coherent framework for well abandonment and site restoration. MPAs have considerable powers to: (i) attach conditions and obligations to planning permissions, (ii) take financial security from minerals operators, (iii) order the removal of plant and machinery from mineral sites, and (iv) take enforcement action including by entering land, carrying out necessary actions and recovering the costs where it is able to do so.

Pre-drilling activity

In response to your question about the kind of activity that would require UKOG to make an application to the NSTA, UKOG would need to apply to the NSTA for consent to commence the drilling of a well, but the types of pre-work that you outline (construction of an access road and a well pad) are matters covered by local planning.

NSTA Financial capability assessments

The NSTA's Financial Guidance[1] lists different activities/licence events where the licensee's financial capability will be assessed. These include "*Licence award, Licence assignment, Innovate licence progression, Well consent, Field development, Change of control of licensee and Pipeline works authorisation" (paragraph 3.2).*

The NSTA's financial assessment would be carried out in accordance with our published guidance when one of these events occurs. However, the above list is not exhaustive and the NSTA may also apply this guidance in any other circumstances where a commitment to undertake an activity under the licence is made that will, or may, require material financial resources to discharge it.
You also mention activities at Horsehill. As and when an application is made to the NSTA, we will conduct a review of financial capabilities in line with our published guidance.

Reliance by Third Parties

In your email you refer to the "considerable store" placed by the Planning Inspector on the financial surveillance conducted by the NSTA. As described above, the NSTA undertakes financial assessments for specific purposes in connection with licence commitments and our Financial Guidance states "*Third parties should carry out their own due diligence and should not rely on any decision of the OGA concerning a person's financial capability or otherwise."* (Paragraph 1.6).
Our Financial Guidance also states that *"the OGA will apply to assess financial capability in respect of certain licence events. It is not a substitute for any other financial assessments that may be carried out by other regulators including onshore, mineral planning authorities, and offshore the Department for Business, Energy and Industrial Strategy's Offshore Petroleum Regulator for Environment and Decommissioning ('OPRED') who may separately seek to satisfy themselves that an Applicant will be able to meet their obligations to decommission offshore installations*." (Paragraph 1.3)
I hope that this information is of assistance.

Yours sincerely

[redacted]

Stuart Payne
Chief Executive – NSTA

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[i] Paragraph 112 of the "*Minerals Guidance on the planning for mineral extraction in plan making and the application process*" (Minerals – Planning for Hydrocarbon Extraction), (extract follows): *"Well decommissioning/abandonment – following exploration, the well is likely to suspended and abandoned for a period of time. Health and Safety Legislation requires its design and construction that, so far as reasonably practicable, there is no unplanned escape of fluids from it. The mineral planning authority is responsible for ensuring the wells are abandoned and the site is restored." Paragraph: 112 Reference ID: 27-112-20140306 Revision date: 06 03 2014.*

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[1] https://www.nstauthority.co.uk/media/8011/financial-guidance-august-2018.pdf

Oil & Gas
Authority

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4th Floor
21 Bloomsbury Street
London
WC1B 3HF21
e: tom.wheeler@ogauthority.co.uk
www.ogauthority.co.uk

Rt Hon Jeremy Hunt MP
House of Commons
London
SW1A 0AA

By e-mail to: jeremy.hunt.mp@parliament.uk

12 February 2020

Dear Mr Hunt

Thank you for your e-mail of 4 February, seeking clarification of the checks made by the OGA in relation to the financial capability of UKOG (234) Ltd, who have recently applied for planning permission to carry out exploration drilling near Dunsfold.

Firstly, I can confirm that your overview of the OGA's current approach to assessing the financial capability of applicants is accurate.

You ask when the most recent assessments were made by the OGA of the financial capacity of UKOG (234) Ltd and the financial viability of UKOG (234) Ltd and of its ultimate parent company, UKOG plc.

With regard to UKOG (234) Ltd, I can confirm that the OGA last assessed this company's financial capability in 2017 (following a previous version of our guidance), which was when the company last made an application to the OGA for permission to carry out activity. To date, the OGA has not received any further applications to conduct activity on any licence held by UKOG (234) Ltd and therefore no further assessments have been made of that company's financial capabilities. When any such application is made, the OGA will carry out the assessments set out in its Financial Guidance, including financial viability and capacity, and take fully into consideration the outcome of those assessments.

An assessment of UKOG plc's financial viability and capability was last carried out in December 2019, but in relation to activities planned by that company on a licence other than PEDL234.

I hope that this helps to clarify the position.

Yours sincerely,

[redacted]

Tom Wheeler
Director, Regulation, OGA

PROTECT DUNSFOLD

Protect Dunsfold Ltd
The Sun Inn Flat
The Common
Dunsfold
Surrey
GU8 4LE

15 March 2024

WSCC Planning and Regulatory Committee,
County Hall,
Chichester, PO19 1RQ

Dear Sir,

Re WSCC/046/23 and WSCC/047/23 re Wood barn Farm, Adversane Lane, Broadford Bridge, Billingshurst, West Sussex

Protect Dunsfold is the campaign group formed to oppose onshore oil and gas exploration at Loxley in Surrey. It is in the same PEDL licensing area as Broadford Bridge and in both cases planning consent has been granted to UKOG (234) Limited as Applicant. UKOG (234) Limited (company number 07055133) is a wholly owned subsidiary of UK Oil and Gas plc (company number 05299925).

We would urge West Sussex County Council (WSCC) as the Minerals Planning Authority to reject this application for an extension of this permission outright for the reasons given by other objectors including the Weald Action Group.

If however WSCC is minded to grant the application then we believe WSCC should secure from the Applicant a financial bond to cover the full costs of site restoration at the end of the consented period for the reasons explained below.

As has been made clear in a recent letter from the North Sea Transition Authority (NSTA) to the Rt Hon Jeremy Hunt MP of 5 February 2024 (enclosed), a Minerals Planning Authority (MPA) is responsible for obtaining site restoration. To quote directly from the NSTA letter to Mr Hunt:-

"Much onshore activity is regulated by the Town and Country Planning Act 1990 ("TCPA") which provides MPAs with the necessary powers to include conditions in planning permissions for the removal of plant and machinery from sites at the end of operations, and to ensure that the land is fully restored. Further powers are provided by the TCPA for MPAs to ensure that funding is available for these activities and to revisit permissions periodically to ensure that adequate controls are in place.

Minerals guidance also makes clear that concerns about funding should be addressed through planning conditions. Indeed, the current guidance states that the MPA is responsible for ensuring the wells are decommissioned and abandoned and the site is restored.[i] MPAs have in practice included appropriate conditions requiring well abandonment in planning permissions. The position nationwide with regard to securing funding for such activity is not consistent. However, Dorset County Council has secured in excess of £100 million for this purpose for the Wytch Farm oilfield."

"[i] Paragraph 112 of the "Minerals Guidance on the planning for mineral extraction in plan making and the application process" (Minerals – Planning for Hydrocarbon Extraction), (extract follows): "Well decommissioning/abandonment – following exploration, the well is likely to suspended and abandoned for a period of time. Health and Safety Legislation requires its design and construction that, so far as reasonably practicable, there is no unplanned escape of fluids from it. The mineral planning authority is responsible for ensuring the wells are abandoned and the site is restored." Paragraph: 112 Reference ID: 27-112-20140306 Revision date: 06 03 2014."

We also know that the NSTA itself has not assessed UKOG 234's financial capability since 2017 or its parent UKOG Oil and Gas plc's financial capability since 2019, see another letter from February 2020 also to Mr Hunt when what is now the NSTA was still known as the Oil and Gas Authority.

The report to the WSCC Planning Committee for the meeting on 19 March does not actually identify the Applicant but the existing planning permission and the application to extend it are submitted by UKOG (234) Limited. While the precise identity of the applicant seeking a planning permission is generally not relevant, in this instance we believe it is highly relevant.

According to the latest to Report and Financial Statements for UKOG (234) Ltd for financial year end 2022 (attached), the Applicant UKOG (234) Ltd continues to record annual losses and is being financially supported by its parent company UK Oil and Gas (see page 10 under the section "Going Concern). UK Oil and Gas has seen its own share price drop dramatically since the last assessment made by the OGA in 2019.

Protect Dunsfold therefore believes that if WSCC does resolve to extend this planning consent it should impose a condition seeking a financial bond to cover the costs of site restoration. It can do this by giving delegated powers to officers to issue a consent, but only once a bond has been provided within a specified time period.

Yours faithfully,

K E Smyth

Director, Protect Dunsfold