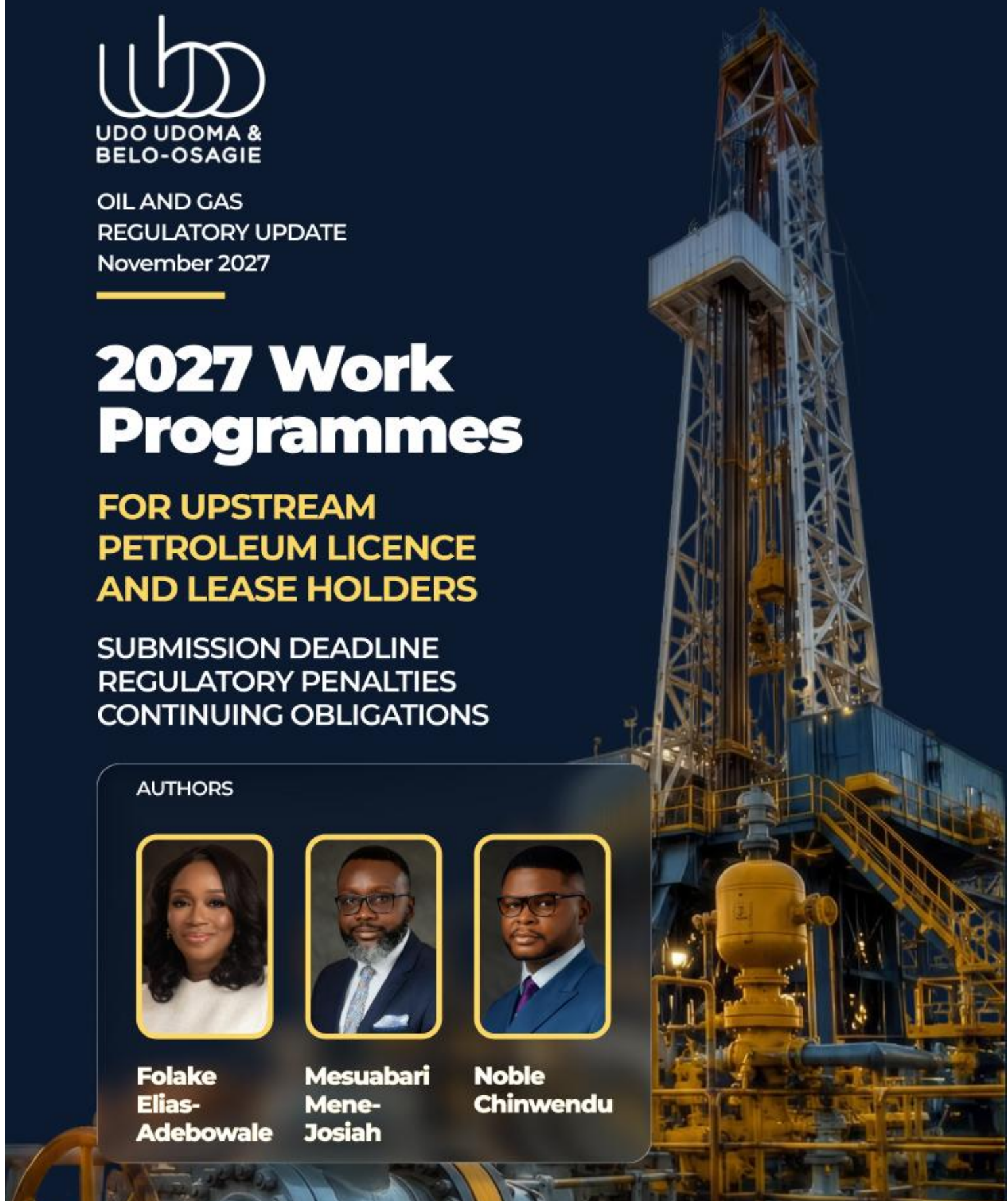
UDO UDOMA & BELO-OSAGIE

OIL AND GAS
REGULATORY UPDATE
November 2027

2027 Work Programmes

FOR UPSTREAM PETROLEUM LICENCE AND LEASE HOLDERS

SUBMISSION DEADLINE
REGULATORY PENALTIES
CONTINUING OBLIGATIONS



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Regulatory Alert

Holders of upstream petroleum licences and leases in Nigeria are required to submit applications for approval of their 2027 Annual Work Programmes and Status Reports to the Nigerian Upstream Petroleum Regulatory Commission (**NUPRC**) by 16 November 2026. Regulation 5(5) of the Nigerian Upstream Petroleum (Commercial) Regulations, 2025 (**Commercial Regulations**) prescribes a submission window running from 15th October to 16th November of each year. Late submission exposes the holder to administrative penalties. The implications also extend to the activities that may lawfully be undertaken under an approved programme and the treatment of expenditure incurred outside it.

1. The legal framework and filing window

The Petroleum Industry Act, 2021 (**PIA**), and the Commercial Regulations establish a continuing system of regulatory oversight of upstream operations. Regulation 5(1) requires every holder of a licence or lease granted or preserved under the PIA to submit an Annual Work Programme to the NUPRC for approval. Regulation 5(5) specifies the filing window; an approved programme operates for the relevant calendar year, from 1st January to 31st December.

For the 2027 calendar year, applications must therefore be submitted no later than 16 November 2026. Submission and approval are distinct steps: the act of filing an application does not itself authorise all activities proposed in that application.

2. What the application must contain

Regulation 6 requires sufficient operational, financial and compliance information for the Commission to assess the proposed programme. In particular, the application should address:

- ✓ proposed activities, their expected commencement dates and duration;
- ✓ work breakdown plans, estimated expenditure and the relevant implementation timetable;
- ✓ regulatory permits and approvals required for proposed operations;
- ✓ the status of implementation of the preceding year's programme; and
- ✓
- ✓



- ✓ supporting documentation, including evidence of applicable statutory payments, reserves and production information where relevant, the organisational structure and a five-year strategic plan for the licence or lease area.

Applicants should review each proposed activity against the licence or lease terms and relevant operational commitments, and reconcile the legal filing requirements with technical plans and approved budgets before submission.

3. Financial consequences of non-compliance

Failure to submit. Regulation 17(a) provides for an administrative penalty of ₦10 million, with a further ₦1 million for each additional day the breach continues.

Activities outside an approved programme. Regulation 17 provides for a separate administrative penalty of ₦100 million for carrying out activities outside an approved Annual Work Programme, together with applicable fees for modification or amendment of the programme.

The penalties address different contraventions and should not be presented as interchangeable. Operators should confirm the applicable regulatory position, the scope of any exception and the status of NUPRC correspondence before taking action on an individual asset.

4. Approval has operational consequences

Under regulation 5(7), a licensee or lessee generally may not carry out activities in a particular year unless those activities are included in an approved Annual Work Programme, subject to the limited exception for health and safety emergencies. Expenditure incurred on activities outside an approved programme may also be ineligible for treatment as upstream development expenditure, subject to the exceptions prescribed by the Commercial Regulations.

These provisions give the approval process a direct bearing on operational readiness, contracting, expenditure planning and the sequencing of regulatory permits. Business teams should not assume that incorporation of an activity in a submitted programme is equivalent to regulatory approval.



5. Continuing reporting and related obligations

Compliance extends beyond the annual application. Regulation 10 requires half-yearly reporting on implementation of approved Annual Work Programmes, while Regulation 19 addresses planned maintenance, integrity assessment and end-of-project reporting. Depending on the licence, stage of operations and relevant triggering events, other duties may arise concerning host communities, environmental management, decommissioning and abandonment, statutory payments and regulatory data submissions.

New awardees should establish an asset-level obligations register that assigns responsibility, identifies the applicable trigger for each requirement and links compliance dates to operational milestones.

6. Practical action points

- ⚒ Confirm that the 2027 programme and preceding-year status report are complete and internally approved before the prescribed filing date.
- ⚒ Reconcile proposed work commitments, expenditure, permit requirements and associated supporting records.
- ⚒ Check whether existing operations and planned expenditure fall within approved work programmes, and assess whether any amendment is required.
- ⚒ Maintain a monitored compliance calendar for half-yearly implementation reporting and all licence-specific regulatory obligations.

Concluding observations

The Annual Work Programme is more than a periodic regulatory filing. It provides a basis for oversight of proposed operations and their implementation. Effective compliance, therefore, calls for coordination among legal, technical, commercial, and finance teams before the filing deadline and throughout the operating year.

Disclaimer

This update is authored by Folake Elias-Adebowale, Mesuabari Mene-Josiah, and Noble Chinwendu of UUBO's Oil & Gas and Disputes teams. It is intended for information purposes only and shall not be construed as legal advice on the subject matter in any circumstances. It does not and shall not be construed as creating any relationship, including a client/attorney relationship, between readers and our firm or any author or serve as legal advice. You should contact your attorney to obtain advice with respect to any particular issue or matter. For more information about our oil and gas, disputes, and other practice group offerings, please visit our website at www.uubo.org or email us at OGTeam@uubo.org and uubo@uubo.org.

Source and citation note

Primary references: Petroleum Industry Act, 2021;

Nigerian Upstream Petroleum (Commercial) Regulations, 2025 (Regulations 5, 6, 10, 17 and 19).