



This form will report compliance with your permit as determined by an Environment Agency officer

Site	Preston New Road Exploration Site EPR/AB3101MW	Permit Ref	UP3431VF		
Operator/ Permit holder	Cuadrilla Bowland Limited				
Date	25/07/2019	Time in	09:40	Out	15:00
What parts of the permit were assessed	Site Set-Up				
Assessment	Site Inspection	EPR Activity:	Installation: X	Waste Op:	Water Discharge:
Recipient's name/position	HSE&P Manager				
Officer's name	EA Officers	Date issued	19/08/2019		

Section 1 - Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations. A detailed explanation and any action you may need to take are given in the "Detailed Assessment of Compliance" (section 3). This summary details where we believe any non-compliance with the permit has occurred, the relevant condition and how the non-compliance has been categorised using our [Compliance Classification Scheme](#) (CCS). CCS scores can be consolidated or suspended, where appropriate, to reflect the impact of some non-compliances more accurately. For more details of our CCS scheme, contact your [local office](#).

Permit Conditions and Compliance Summary

Condition(s) breached

		Condition(s) breached
a) Permitted activities	1. Specified by permit	N
b) Infrastructure	1. Engineering for prevention & control of pollution	A
	2. Closure & decommissioning	NA
	3. Site drainage engineering (clean & foul)	A
	4. Containment of stored materials	A
	5. Plant and equipment	A
c) General management	1. Staff competency/ training	N
	2. Management system & operating procedures	N
	3. Materials acceptance	N
	4. Storage handling, labelling, segregation	N
d) Incident management	1. Site security	N
	2. Accident, emergency & incident planning	N
e) Emissions	1. Air	N
	2. Land & Groundwater	N
	3. Surface water	A
	4. Sewer	N
	5. Waste	N
f) Amenity	1. Odour	A
	2. Noise	A
	3. Dust/fibres/particulates & litter	A
	4. Pests, birds & scavengers	A
	5. Deposits on road	A
g) Monitoring and records, maintenance and reporting	1. Monitoring of emissions & environment	N
	2. Records of activity, site diary, journal & events	N
	3. Maintenance records	N
	4. Reporting & notification	N
h) Resource efficiency	1. Efficient use of raw materials	N
	2. Energy	N

KEY: C1, C2, C3, C4 = CCS breach category (* suspended scores are marked with an asterisk), A = Assessed (no evidence of non-compliance), N = Not assessed, NA = Not Applicable, O = Ongoing non-compliance – not scored

Number of breaches recorded	0	Total compliance score (see section 5 for scoring scheme)	0
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If the Total No Breaches is greater than zero, then please see Section 3 for details of our proposed enforcement response

Section 2 – Compliance Assessment Report Detail

This section contains a report of our findings and will usually include information on:

- the part(s) of the permit that were assessed (e.g. maintenance, training, combustion plant, etc)
- where the type of assessment was 'Data Review' details of the report/results triggering the assessment
- any non-compliances identified
- any non-compliances with directly applicable legislation
- details of any multiple non-compliances
- information on the compliance score accrued inc. details of suspended or consolidated scores.
- details of advice given
- any other areas of concern
- all actions requested
- any examples of good practice.
- a reference to photos taken

This report should be clear, comprehensive, unambiguous and normally completed within 14 days of an assessment.

A joint inspection with the Health and Safety Executive was undertaken to walk the lines and inspect the site setup prior to commencement of hydraulic fracturing of Well PNR2.

This compliance assessment report also details the MCERTS verification that Cuadrilla undertook on flowmeters used to measure the flow of injected hydraulic fracturing fluids.

No non-compliances were recorded during the site inspection or MCERTS verification.

Well Test Package

The well test package, which is used to separate solids, gas and condensate from the flowback fluid, was inspected to verify the changes approved in permit variation V005. The configuration of equipment and lines was confirmed to be in accordance with the process flow diagram approved in the permit variation apart from the steam heater which was not installed at this stage. The steam heater is used to heat the flowback to prevent hydrates being formed and will be installed before the well test phase begins.

We spoke to the contractor who explained the procedure for operating the choke to divert circulation fluid (fluid that has not be in contact with the formation) to the open top tanks in line with the operating instruction.

The equipment, connections and lines located on an impermeable HDPE surface with a bund designed to CIRIA that provides secondary containment for any potential spills. The containment has undergone leak testing. All pipe connections are within the bund and crash barriers are positioned around to protect it.

Fracturing equipment

The frac pumps were surrounded on three sides by high acoustic walls. The equipment used to make up and mix the hydraulic fracturing fluid was seen in place including the loading mechanism for the sand. The mixing equipment was surrounded by sheeting to minimise the escape of dust.

The tank set up was viewed. Three of the tanks are reserved for flowback during the hydraulic fracturing phase with the rest being used for surface water storage to be used during hydraulic fracturing.

MCERTS Verification of Flowmeters

A site inspection was undertaken by a MCERTS inspector to check if the flow monitoring arrangements meet the requirements of the Environment Agency's *minimum requirements for the self-monitoring of flow*. This inspection assessed the three flowmeters that are used to measure the flow of hydraulic fracturing fluids being injected into the well. We have reviewed these reports and are satisfied that the key MCERTS installation criteria have been met and that the overall uncertainty for flow measurement is satisfactory.

Cuadrilla has committed to undertaking the MCERTS management system audit, also required by *minimum requirements for the self-monitoring of flow*, once hydraulic fracturing starts to ensure the operation and maintenance of the flowmeters is satisfactory.

Storage of Chemicals

We inspected the storage of hydrochloric acid and polyacrylamide. Hydrochloric acid solution was contained in IBCs and located on an impermeable pad within a banded area. Bulk bags containing solid polyacrylamide were held in a closed weatherproof shipping container.

Well Pad Liner

A service cabinet on the well pad was moved so that the noise barrier could be repositioned around the frac pumps. A patch of the well pad liner, approximately 1m², was required once the service cabinet was

removed. We viewed the material inspection certificate of the HDPE used and the report detailing the leak detection survey carried out after the HDPE was welded in place. The report confirmed that there were no leaks from the final patch. A Construction Quality Assurance (CQA) engineer was present during the works.

Surface Water Treatment and Discharge

Commissioning of the surface water treatment plant is being undertaken and there has been no discharge of treated surface water to Carr Bridge Brook. Surface water collected on the well pad is being stored for use in hydraulic fracturing.

Ambient Air Monitor

A replacement MCERTS Particulate Matter monitor was installed on 22 July due to Cuadrilla's data handling system not being compatible with the previous MCERTS monitor. The new monitor is installed on the platform on the earth bund to the North East of the site, adjacent to the old monitor. The two monitors will be run in parallel to ensure that data is comparable before removing the old monitor.

Accelerometers

The 12 accelerometers that will be installed in Well PNR1z for microseismic monitoring of PNR2 were viewed, no issues were observed.



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Section 3- Enforcement Response **Only one of the boxes below should be ticked**

You must take immediate action to rectify any non-compliance and prevent repetition. Non-compliance with your permit conditions constitutes an offence and can result in criminal prosecutions and/or suspension or revocation of a permit. Please read the detailed assessment in Section 2 and the steps you need to take in Section 4 below.

Other than the provision of advice and guidance, at present we do not intend to take further enforcement action in respect of the non-compliance identified above. This does not preclude us from taking enforcement action if further relevant information comes to light or advice isn't followed.

In respect of the above non-compliance you have been issued with a warning. At present we do not intend to take further enforcement action. This does not preclude us from taking additional enforcement action if further relevant information comes to light or offences continue.

We will now consider what enforcement action is appropriate and notify you, referencing this form.

Section 4- Action(s)

Where non-compliance has been detected and an enforcement response has been selected above, this section summarises the steps you need to take to return to compliance and also provides timescales for this to be done.

Criteria Ref.	CCS Category	Action Required / Advised	Due Date
See Section 1 above			

Section 5 - Compliance notes for the Operator

To ensure you correct actual or potential non-compliance we may

- advise on corrective actions verbally or in writing
- require you to take specific actions in writing
- issue a notice
- require you to review your procedures or management system
- change some of the conditions of your permit
- decide to undertake a full review of your permit

Any breach of a permit condition is an offence and we may take legal action against you.

- We will normally provide advice and guidance to assist you to come back into compliance either after an offence is committed or where we consider that an offence is likely to be committed. This is without prejudice to any other enforcement response that we consider may be required.

- Enforcement action can include the issue of a formal caution, prosecution, the service of a notice and or suspension or revocation of the permit.

- A civil sanction Enforcement Undertaking (EU) offer may also be available to you as an alternative enforcement response for this/these offence(s).

See our Enforcement and Civil Sanctions guidance for further information

This report does not relieve the site operator of the responsibility to

- ensure you comply with the conditions of the permit at all times and prevent pollution of the environment
- ensure you comply with other legislative provisions which may apply.

Non-compliance scores and categories

CCS category	Description	Score
C1	A non-compliance which could have a major environmental effect	60
C2	A non-compliance which could have a significant environmental effect	31
C3	A non-compliance which could have a minor environmental effect	4
C4	A non-compliance which has no potential environmental effect	0.1

Operational Risk Appraisal (Opra) - Compliance assessment findings may affect your Opra score and/or your charges. This score influences the resource we use to assess permit compliance.

Section 6 – General Information

Data protection notice

The information on this form will be processed by the Environment Agency to fulfill its regulatory and monitoring functions and to maintain the relevant public register(s). The Environment Agency may also use and/or disclose it in connection with:

- offering/providing you with its literature/services relating to environmental matters
- consulting with the public, public bodies and other organisations (e.g. Health and Safety Executive, local authorities) on environmental issues
- carrying out statistical analysis, research and development on environmental issues
- providing public register information to enquirers
- investigating possible breaches of environmental law and taking any resulting action
- preventing breaches of environmental law
- assessing customer service satisfaction and improving its service
- Freedom of Information Act/Environmental Information Regulations request.

The Environment Agency may pass it on to its agents/representatives to do these things on its behalf. You should ensure that any persons named on this form are informed of the contents of this data protection notice.

Disclosure of information

The Environment Agency will provide a copy of this report to the public register(s). However, if you consider that any information contained in this report should not be released to the public register(s) on the grounds of commercial confidentiality, you must write to your local area office within 28 days of receipt of this form indicating which information it concerns and why it should not be released, giving your reasons in full.

Customer charter

What can I do if I disagree with this compliance assessment report?

If you are unable to resolve the issue with your site officer, you should firstly discuss the matter with the officer's line managers. If you wish to raise your dispute further through our official Complaints and Commendations procedure, phone our general enquiry number 03708 506 506 (Mon to Fri 08.00–18.00) and ask for the Customer Contact team or send an email to enquiries@environment-agency.gov.uk. If you are still dissatisfied, you can make a complaint to the Ombudsman. For advice on how to complain to the [Parliamentary and Health Service Ombudsman](#) phone their helpline on 0345 015 4033.