



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

Site	Kirby Misperton A Wellsite		Permit Ref	402444		
Operator/ Permit holder	Third Energy U K Gas Limited					
Date	17/11/2017		Time in	10:15	Out	12:30
What parts of the permit were assessed	follow up actions					
Assessment	Site Inspection	EPR Activity:	Installation	Waste Op	X	Water Discharge
Recipient's name/position	Operations Support Manager					
Officer's name	[REDACTED]		Date issued	20/11/2017		

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

This inspection was a follow up on outstanding actions. Reports on air monitoring and water monitoring have also been received.

Whilst on site surface water was being emptied from the extension perimeter ditch for offsite treatment.

KM7 Geophones

The string shot test report was received on 15th November and will be placed on the public register. The geophone testing has now been brought into the environmental management system and this was viewed at the time of inspection. Advice given that further comprehensive records should be maintained of geophone testing. This action is now closed until further testing at perforation stage and in the meantime the geophones have been switched off.

Report Review

On the 13th November, Halliburton tested their microseismic geophone string emplaced in the KM7 well for the purpose of monitoring the progress of hydraulic fractures in KM8 well. The geophone string had already been tested successfully at the surface, and by automated diagnostic tests when initially emplaced. The 13th November test comprised firing a small explosive charge in KM8 at the geophone depth, and recording and analysing the seismic arrivals at the geophones. All but one of the 33 geophone components were operational and showed identifiable seismic arrivals that allowed the contractor to determine the orientation of the geophones. The source was estimated to have an equivalent seismic magnitude of ML -3.0. The test was considered to be satisfactory.

Further testing is planned at the time of well perforation.

Management Systems

Sampling methodology has now been incorporated into OP-EN-08. OP-EN-07 has also been updated. This action is now closed.

Further information on the flowmeter is still outstanding. Available information was reviewed on this visit.

Action: Third Energy to justify installation location and suitability of this flowmeter for use with the viscosity and solids content of frac fluid. Further calibration information is required including details of the manufacturer calibration factor for the flowmeter and how the calibration factor is used.

Air Monitoring Reports

Report received for period 23rd October to 5th November 2017. The passive results were not complete at the time of issue and will be included in the next report. This will be placed on the public register.

Surface Water & Groundwater Monitoring Reports

Reports have been received for the first 4 weeks of weekly surface water and groundwater monitoring reports. This covers the period 18th October to 6th November 2017.

At the time of issue of each weekly report not all parameters are available due to laboratory turnaround times, these are included on subsequent reports. This will be placed on the public register.

Chemicals on site

An email was received on 17th November from Third Energy regarding the questions raised on CAR 402444/0295608 with the following information:

Star-cide is a biocide used to prevent bacteria, mould or yeast growth in completion fluids. Star-cide is a direct substitution for Safe-cide which is a trade name from another supplier. Typical dosage rate is 1.0 – 1.44 kg/m3 currently 1 x 25ltr drum kgs is onsite.

Oxygon is an oxygen scavenger used in completion fluids to prevent corrosion of casing or completion tubing required to maintain well integrity. Oxygon is a direct substitute for Safe-Scav which is a trade name from another supplier. Typical dosage rate is 0.29 kg/m3 currently 1 x 25 kg pail is onsite.

Barazan is a Halliburton trade name for Xanthan gum which is used to viscosify fresh water, viscosified fluid is used to clean-out sand or debris out of the well. Typical dose is 2.85-5.71 kg/m3 and we have a total of 18 x 25kg sacks. The Barazan has been moved offsite to KM-B location. Barazan has the same purpose as WG-11 Gelling Agent.


It was confirmed at the inspection that these chemicals will not be used as frac fluid additives. The Barazan will be brought back on site at the completion phase of operations. This action is now closed.

Coiled Tubing Unit – Screen Out

The coiled tubing activities procedure referred to in the previous visit was available on site, TEG- KM8-SOCOP-R1 issued 12th November 2017 Screen Out Clean Out Procedure. This action is now closed.

Flowback Sampling

The sampling of flowback was discussed and how this would be carried out. The operator currently plans to sample from the storage tanks as soon as possible after they have been filled with flowback. Good records must be maintained of sample points, times, storage and sampling personnel.

 Environment Agency	EPR Compliance Assessment Report	Report ID: 402444/0296401	
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Operator/ Permit	Third Energy U K Gas Limited	Date	17/11/2017

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.