

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

Site	West Newton 'A' Well Site EPR/BB3001FT		Permit Ref	BB3001FT	
Operator/ Permit holder	RATHLIN ENERGY (UK) LIMITED				
Date	16/08/2019		Time in	09:40	Out 11:42
What parts of the permit were assessed	Procedures, records, equipment				
Assessment	Site Inspection	EPR Activity:	Installation	X	Waste Op
Recipient's name/position	redacted				
Officer's name	redacted		Date issued	16/08/2019	

**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**

a) Permitted activities	1. Specified by permit	A	
b) Infrastructure	1. Engineering for prevention & control of pollution	A	
	2. Closure & decommissioning	N	
	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	A	
	2. Management system & operating procedures	A	
	3. Materials acceptance	N	
	4. Storage handling, labelling, segregation	N	
d) Incident management	1. Site security	A	
	2. Accident, emergency & incident planning	A	
e) Emissions	1. Air	N	
	2. Land & Groundwater	N	
	3. Surface water	N	
	4. Sewer	N	
	5. Waste	N	
f) Amenity	1. Odour	N	
	2. Noise	N	
	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	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

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.

### Present

redacted

Well testing had not yet commenced at the time of inspection.

### Inspection of records

The training record for flare operators (RE-05-FO-010) dated 16th August 2019 was inspected. Rathlin Energy Gas management plan, Capping procedures, Purging of well test equipment, Operation of well test/combustion units, Odour management plan, Recording flare stack temperature, and Leak detection and repair plan were recorded as trained out.

The training record for EXPRO well test operators (RE-05-FO-010) dated 15th August 2019 was inspected. Rathlin Energy Gas management plan, Leak detection and repair plan, Odour management plan, Vapour recovery plan, Management of scrubber reactants, Purging of well test equipment, and Capping procedures were recorded as trained out.

The 'Rathlin Energy West Newton 'A' site – Daily Environmental Report' check lists for 12th to 15th August 2019 were inspected and found to be complete.

The Tank, chemicals, fuel and lubricant inventories for 14th and 15th August 2019 were inspected.

A printed copy of the 'Emergency response plan onsite guidelines' (RE-04-005 Rev: 5.00 issued 04/01/2019) was present in the well site supervisor's office.

### Site inspection

The EXPRO well test equipment was being assembled at the time of inspection. The tagging of joints and components for leak detection monitoring had not yet been carried out (requirement of Leak detection and repair plan Rev2 RE-EPRAWNA-LDAR-012).

It was reported that all pipe work is to be pressure tested with water prior to operation. Records relating to this will be checked at future inspection.

The activated carbon abatement for the water stock tank, oil stock tanks and oil storage tank vent lines had not yet been installed (requirement of Management of scrubber reactants work instruction Rev 5 RE-04-021).

Gas flow from the oil reservoir test will be measured using a low flow coriolis meter on the EXPRO equipment. The installed meter identification tag displayed the following information: Certification 19/76049, serial no. 14369641, Cal 12.03.2019. The calibration certificate for the meter will be checked at future inspection.


The CEB1200 and CEB4500 burners for disposal of waste gas and associated equipment and

propane support fuel were present on site. Spare thermocouples for temperature monitoring were held on site.

The open section of the perimeter containment ditch was inspected. The water was clear with no visible signs of contamination. Water level 30 on gauge board.

#### Procedure revisions

Copies of revised procedures 'RE-04-021 Rev 5 Management of scrubber reactants' and 'RE-04-035 Capping of flexible hoses work instruction' were received 07/08/2019. The revised procedures are agreed by the Environment Agency as a change to Environmental Permit Operating techniques Table S1.2 under permit condition 2.3.1 (a).

 Environment Agency	<b>EPR Compliance Assessment Report</b>	Report ID: PP3833VA/0339568
<b>This form will report compliance with your permit as determined by an Environment Agency officer</b>		
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Operator/ Permit	RATHLIN ENERGY (UK) LIMITED	Date 16/08/2019

<b>Section 3- Enforcement Response</b>		<b>Only one of the boxes below should be ticked</b>
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.		

<b>Section 4- Action(s)</b>			
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 <b>major</b> environmental effect	60
C2	A non-compliance which could have a <b>significant</b> environmental effect	31
C3	A non-compliance which could have a <b>minor</b> environmental effect	4
C4	A non-compliance which has <b>no</b> 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](mailto: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.