

**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	08/09/2021		Time in	10:41	Out 13:17
What parts of the permit were assessed	See below				
Assessment	Audit	EPR Activity:	Installation	X	Waste Op
Recipient's name/position	redacted				
Officer's name	redacted		Date issued	15/09/2021	

**Section 1 - Compliance Assessment Summary**

This is based on the requirements of the permit under the Environmental Permitting Regulations (EPR). 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**

Permit Conditions and Compliance Summary	Condition(s) breached
<b>a) Permitted activities</b>	
1. Specified by permit	A
<b>b) Infrastructure</b>	
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
<b>c) General management</b>	
1. Staff competency/ training	A
2. Management system & operating procedures	N
3. Materials acceptance	N
4. Storage handling, labelling, segregation	A
<b>d) Incident management</b>	
1. Site security	A
2. Accident, emergency & incident planning	A
<b>e) Emissions</b>	
1. Air	N
2. Land & Groundwater	N
3. Surface water	N
4. Sewer	N
5. Waste	N
<b>f) Amenity</b>	
1. Odour	A
2. Noise	N
3. Dust/fibres/particulates & litter	N
4. Pests, birds & scavengers	N
5. Deposits on road	N
<b>g) Monitoring and records, maintenance and reporting</b>	
1. Monitoring of emissions & environment	N
2. Records of activity, site diary, journal & events	A
3. Maintenance records	A
4. Reporting & notification	N
<b>h) Resource efficiency</b>	
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**

**MSA, MSB, TCM = Management System condition A, Management System Condition B and Technically Competent Manager condition which are environmental permit conditions from Part 3 of schedule 9 EPR (see notes in Section 5/6).**

<b>Number of breaches recorded</b>	0	<b>Total compliance score</b> (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.

Present: redacted

### Audit of procedures and records

Daily operations reports for the period 31/08/2021 to 07/09/2021 were inspected. No mining wastes were recorded as having been removed from site since the recommencement of WNA2 well testing.

Daily environmental checklist records ref RE-05-CHK-008 Rev. 3.00 were inspected and found to have been completed for the period 31/08/2021 to 07/09/2021.

A printed copy of the document 'Emergency Response Plan Onsite Guidelines' reference RE-04-005 dated 16/08/2020 was present in the well site supervisor's office.

The Interceptor Lockout Procedure Form ref RE-05-F0-039 Rev:3.00 (in relation to the well site surface water system discharge) was inspected and found to have been completed 01/09/2021 confirming the interceptor discharge had been locked out and secured prior to the commencement of well testing activities.

Records dated 31/08/2021 of the welding and leak testing of the well test equipment bund HDPE liner, and associated panel layout diagrams, were inspected.

The Leak Detection Inspection Programme – WNA Wellsite record ref RE-EPRA-WNA-LDIP-002 was inspected. 220 components were recorded for weekly inspection and testing with the most recent inspection and testing completed 05/09/2021.

The following training records were inspected and found to have been completed (note: the well test equipment and crew moved directly to the WNA site from the WNB site so some recorded sheets have the WNB identifier): RE-OPRA-WNB-VRP-011 vapour recovery plan, RE-LSRP-WNB-LRP-001 leak repair procedure, RE-ERP-WNB-LDP-001 leak detection procedure, Gas awareness and familiarisation training, RE-04-34 purging well test equipment, RE-04-35 capping of flexible hoses, RE-EPRA-WNB-OMP009 odour management plan, RE-04-20 flare stack temperature, RE-04-32 operating combustion units, RE-04-36 refuelling plant and equipment, RE-04-037 crude oil off loading work instruction.

### Site inspection

The open section of perimeter containment ditch was inspected. The level was low and the water clear with no visible oil.

CEB1200 and CEB4500 enclosed flare units were present on site and assembled for use with propane support fuel. The combustion unit manifold was assembled with lines from both the well test separator and surge tank. Each line was separately flow metered. Calibration records in relation to the flow meters were inspected.

A bund had been constructed on the well site surface using a reinforced concrete grain walling

system lined with geotextile and a welded HDPE liner laid upon a geotextile under layer placed on a bed of sand. The bund contained well test equipment including the separator and surge tank plus the crude oil trailer tank and the produced water trailer tank. The crude oil trailer tank and produced water trailer tank vent lines and off load back venting lines were connected to activated carbon VOC abatement drums.

Slick line operations were being carried out on the WNA2 well at the time of inspection. No odour present on site.

Section 3- Enforcement Response		Only one of the boxes below should be ticked
<p>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.</p> <p><i>*Non-compliance with MSA, MSB &amp; TCM do not constitute an offence but can result in the service of a compliance, suspension and/or revocation notice.</i></p>		
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**

*\*A breach of permit condition **MSA**, **MSB** & **TCM** is not an offence but may result in the service of a notice requiring compliance and/or suspension or revocation of the permit.*

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.

**MSA, MSB & TCM are conditions inserted into certain permits by Schedule 9 Part 3 EPR**

**MSA** requires operators to manage and operate in accordance with a written management system that identifies and minimises risks of pollution.

**MSB** requires that the management system must be reviewed, kept up-to-date and a written record kept of this.

**TCM** requires the submission of technical competence information.

## 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?

You must notify your local officer within 28 days of receipt if, you wish to challenge any part of 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.