

Notice of request for more information

The Environmental Permitting (England & Wales) Regulations 2016

Rathlin Energy (UK) Limited
West Newton 'A' Well Site
Fosham Road
Marton
Hull
HU11 5DA

Application number: **EPR/BB3001FT/V006**

The Environment Agency, in exercise of its powers under paragraph 4 of Part 1 of Schedule 5 of the above Regulations, requires you to provide the information detailed in the attached schedule. The information is required in order to determine your application for a permit duly made on 18/09/2024.

Send the information to either the email or postal address below by 17/03/2025. If we do not receive this information by the date specified, then we may treat your application as having been withdrawn or it may be refused. If this happens you may lose your application fee.

Email address: miranda.culnane@environment-agency.gov.uk

Postal address:
Permitting Support, NPS Sheffield
Quadrant 2, 99 Parkway Avenue
Parkway Business Park
Sheffield
S9 4WF

Name	Date
Miranda Culnane	28/02/2025

Authorised on behalf of the Environment Agency

Notes

These notes do not form part of this notice.

Please note that we charge £1,200 where we have to send a third or subsequent information notice in relation to the same issue. We consider this to be the first notice on the issues covered in this notice.

The notes in italics that appear after information requests in the attached schedule do not form part of the notice. The notes are intended to assist you in providing a full response.

Schedule

Following a review of the information in the permit application we now require further information, as listed below, which may be copied into a Schedule 5 Notice:

- 1) Provide a copy of the HFP (Hydraulic Fracture Plan). This is needed before the permit can be issued. Provide any comments given by the NSTA.

***Reason:** Supporting documents confirm the HFP has been submitted to both the NSTA and EA for approval with sign off. This is not correct and given the public interest on this, we request a copy ahead of the permit issued.*

2. The Agency accepts the response to Question 15 of the first Schedule 5. However, the answer provided to Question 18 in the first Schedule 5 does appear to directly oppose the justification for the use of acid, confirming acid stimulation as ineffective. Explain why acid-based materials are still justified within the wash and squeeze activity given their known negligible impact on the reservoir.

***Reason:** Greater explanation is needed to justify putting acid-based liquids in the environment if they are not going to add value.*

3. Question 16 of the first Schedule 5 is only partially answered. For the wash/squeeze activity, confirm explicitly the volumes intended to be used, the exact depths and frequency of the acid wash activity. Explain and justify any variation to figures provided.

***Reason:** To be registered as a deminimis activity we need to know such specifics to include in the permits operating techniques. We appreciate there is a site and well specific aspect to the volume required for each well maintenance treatment, however we will need an indication of the maximum volume required per well maintenance treatment at each site. The Environment Agency will need this clarification so we can update the groundwater activity exclusion registrations for any well maintenance treatments where necessary.*

4. Define which chemicals listed in the chemical inventory are to be used for which activity.

***Reason:** The Agency does not accept the response to Question 17. It is acknowledged that point 21 of the first Schedule 5 does make effort to answer this question, but we request it is made clearer, ideally the information tabulated for clarity. This level of detail is requested because of the nature of the operation and public scrutiny on chemicals being used. To reiterate from the first Schedule 5, it is unclear which chemical is being used for which activity. Justification for the use of hazardous chemicals over non-hazardous alternatives is needed for both activities. The Agency acknowledge the only additional product is the MO-IV Breaker and that all other products have previously been approved.*

5. Confirm the location of the downhole location of the KAF with a NGR, or equivalent.

Reason: *To specifically cite the location of the mining waste facility.*

6. Question 10 of the first Schedule 5 has only been partially answered. Concerns remain around the factor of safety above and below the stimulation interval and the adjacent lithologies. Explain what measures are in place to ensure the stimulation activities do not extend beyond the KAF. Explain how these thicknesses have been calculated. What real time mitigation measures are in place during the stimulation activities should propagation into the evaporites occurs.

Reason: *To re-affirm the distance between the stimulation zone and adjacent stratigraphic units across the 27/30m interval which the stimulation is proposed to take place; and to ensure the upper and lower lithologies are not at risk from any stimulation effects. Reassurance is needed to show the stimulation fractures will be isolated to only the Kirkham Abbey Formation.*

7. Provide Chemical Inventory Data Sheets for Proprietary antifoam, Proprietary dispersants (Protekt 318), Tallowalkylamine ethoxylates and EGMBE, inclusive of CAS numbers.

Reason: *These are confirmed as possible components for the acid wash.*

8. Provide the CAS number for the MO-IV BREAKER. Confirm what other components will be used with this product, specify quantities of each.

Reason: *to allow for a robust assessment.*

9. Confirm the volume and frequency of the acid/alkali wash.

Reason: *The Agency acknowledge this to be a diminimus activity but to complete the permit which the required metrics, this needs to be explicitly confirmed.*

10. Explain why the stimulation fluid contains hazardous properties that cannot be substituted for alternatives (e.g. non-hazardous alternatives).

Reason: *The Agency acknowledges many of the products you are using as suitable, but formal justification for not using alternatives which are non-hazardous is needed for audibility purposes on the public register.*