

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 02/05/2025. If we do not receive this information by the date specified, then we may treat your application as having been withdrawn or it may be refused.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	11/04/2025

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 second 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:

- 1) Provide a plan showing the lateral extent of the mining waste facility down hole location, plotted at surface.

Reason: *To show the location of the mining waste facility.*

- 2) Figure 2 in the second Schedule 5 defines two stimulation zones; an upper and a lower zone. The original application and the subsequent two Schedule 5's only discuss one stimulation zone between 1736-1761m MD BRT. Explain why a shallower stimulation zone has now been introduced to the application. Explain why this wasn't discussed in Question 10 of the first Schedule 5, when concerns were raised over the factor of safety to the upper and lower lithologies; which confirms the proposed area to undertake the reservoir stimulation is 1736-1761m MD BRT leaving 20.6m TVD above the top perforations to the Fordon Evaporite and 18.85m TVD below the bottom of the perforations to the Hayton Anhydrite. Explain why the discussion on the inversion profile on the resistivity curve provided in the first Schedule 5 also only highlights one zone for the intended stimulation. If this shallower stimulation is now required, all supporting documents will need to be revised to include this. Explanations are also needed to explain why there is a dispersion plume below the deeper stimulation zone in Figure 2 and not in the shallower zone and equally why vertical dispersion does not occur above both intended zones, with due regard to vertical dispersion above the shallower stimulation being immediately adjacent to the Fordon Evaporite.

Reason: *It is unclear from the primary application that two zones of stimulation are required. Clear, robust, and defined understanding of the proposed activities is needed so an accurate assessment can be made.*

- 3) The answer to Question 7 of the second Schedule 5 is only answered in part. We require confirmation of all CAS number for those components, inclusive of the antifoam and dispersants. If these are a combination of chemicals, then a breakdown of constituents is needed, each with a CAS number. We acknowledge the comment that they have previously been approved, but every application needs to be considered as a standalone

set of documents to avoid risks associated with incorrectly referencing other files assumed to be correct.

Reason: *These are confirmed as possible components for the acid wash and need to be assessed.*

- 4) Confirm which chemicals previously obtained from Halliburton have been removed from operational use and provide an updated inventory on replacement products, inclusive of all MSDS requirements, including CAS numbers for parent chemicals and CAS numbers for any sub-divisions, percentage quantities and total volumes.

Reason: *To be clear on which chemicals will be used in the groundwater activity and whether or not they are hazardous or non-hazardous and whether any technical assessment is needed to affirm use or whether they have already had prior assessment.*