



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

Site	West Newton Well Site EPR/BB3001FT		Permit Ref	BB3001FT	
Operator/ Permit holder	Rathlin Energy (UK) Limited				
Date	13/05/2019	Time in	08:15	Out	12:57
What parts of the permit were assessed	Operating techniques, engineering for prevention and control of emissions, site drainage, containment				
Assessment	Audit	EPR Activity:	Installation: X	Waste Op:	Water Discharge:
Recipient's name/position	redacted				
Officer's name	redacted		Date issued	14/05/2019	

**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**

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	N
	2. Management system & operating procedures	N
	3. Materials acceptance	N
	4. Storage handling, labelling, segregation	A
d) Incident management	1. Site security	A
	2. Accident, emergency & incident planning	N
e) Emissions	1. Air	N
	2. Land & Groundwater	N
	3. Surface water	N
	4. Sewer	N
	5. Waste	A
f) Amenity	1. Odour	A
	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	A
	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**

<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.

Joint audit with the Health & Safety Executive (HSE).

### Present:

Redacted

### Site inspection

An inspection of the drilling rig and ancillary equipment was carried out.

A hard piped line from the choke valve has been installed to enable the connection of an emergency flare stack when drilling through hydrocarbon bearing formations. The line is currently connected to an open tank to enable diversion and collection of formation water if it is encountered and produced during drilling.

The open section of the perimeter containment ditch was inspected. Water silty in colour with no visible oil or dead animals. Level 60cm on gauge board.

Waste storage areas inspected. Waste cement stored in a plastic sheeting lined open skip. Waste oil stored in drums on a bunded area.

### Wellbore construction – WR11 requirements

Records relating to the well construction were inspected to audit compliance with the measures proposed to protect water resources as detailed in the wellbore construction programme document 'West Newton A-2 Well WR11 application supporting statement REV: 2' provided in support of Rathlin Energy's WR11 notice to the Environment Agency [Water Resources Act 1991 Section 199 (1) &(2) as amended]. No non-compliances were identified.

At the time of inspection drilling was ongoing and only the 20" conductor casing and the 13 3/8" surface casing had been completed.

Record of audit:

<b>WNA-2 WR11 Application supporting statement RE-05-EPRA-WNA-2-WR11 Rev:2 requirement</b>	<b>Documents inspected</b>	<b>Findings &amp; notes</b>
<b>Surface Conductor (0 – 80m TVD KB)</b>		
Section 5.1 page 8. Upon completion of the cellar construction, a vertical 24" (609.6mm) hole will be drilled to a depth of approximately 80m TVD KB.	Inspected 13/05/2019: Daily Operations Report Conductor Installation no. 23 for 29.01.19	Records 28" hole at 74.5m BGL.


<p>Section 5.1 page 8. Once the 24" (609.6mm) hole has been drilled a 20" (508mm) conductor casing will be run and cemented to surface. The primary purpose of this conductor is to create stable foundation for the main drilling rig and to isolate any permeable sand stringers in the Boulder Clay (0-49m) and the top section of unconsolidated Cretaceous Chalk.</p>	<p>Inspected 13/05/2019: Daily Operations Report Conductor Installation no. 26 for 01.02.19</p>	<p>Current depth recorded as 28" hole at 74.5m BGL. 13:00 to 15:15 hrs cemented 20" casing to surface. 16:45 to 17:00 hrs confirmed 20" casing vertical and centralised in 42" conductor.</p>
<p><b>Hole Section 17.5" (80m – 535m TVD KB)</b></p>		
<p>Section 5.2 page 8 A 17.5" (444.5mm) hole will be drilled from 80m to approximately 535m to the top of the Lias Group using a bentonite polymer water based mud system. This section of the well will be drilled vertically.</p>	<p>Inspected 13/05/2019: Daily Operations Report no. 14 for 01.05.19</p>	<p>11:00 to 12:00 hrs Current depth shown as 562m MD / 562m TVD &amp; BRT</p>
	<p>Inspected 13/05/2019: Final as run Casing Tally dated 02.05.19 for 13 3/8" casing.</p>	<p>Shoe setting depth 561m BRT.</p>
<p>Section 5.2 page 8 Once this hole section has been drilled a 13.375" (339.8mm) casing will be run and cemented back to surface. This will isolate the whole of the Cretaceous Chalk prior to drilling into any further permeable strata.</p>	<p>Inspected 13/05/2019: Daily Operations Report no. 15 for 02.05.19.</p>	<p>19:15 to 22:30 hrs cement casing. Estimated cement returns to surface 137 bbls. The casing was pressure tested to 2000 psi for 10 minutes.</p>
	<p>Inspected 13/05/2019: Final as run Casing Tally dated 02.05.19 for 13 3/8" casing.</p>	<p>Shoe setting depth 561m.</p>
	<p>Inspected 13/05/2019: Schlumberger Cement Job Report dated 02.05.2019 in relation to cementing of the 13 3/8" casing.</p>	<p>Cement pumped. 18m<sup>3</sup> (estimated) excess cement showed at surface. 10 minute pressure test carried out at 150 bar to demonstrate casing joint integrity.</p>
<p>Section 5.2 page 8 A formation Integrity Test will be carried out on the 13.375" (339.8mm) casing immediately following the drilling out of the shoe, at the start of the next hole section.</p>	<p>Inspected 13/05/2019: Daily Operations Report no. 20 for 07.05.19.</p>	<p>07:00 to 08:15 hrs FIT test recorded.</p>
	<p>Inspected 13/05/2019: Pressure test chart dated 07-5-2019 in relation to the Formation Integrity Test (FIT).</p>	<p>FIT reported to have been conducted following drilling out of the shoe at the base of the 13 3/8" casing.</p>

**Key**

Abbreviation	Definition
bbls	Barrels
BGL	Below ground level
BRT	Below rotary table
FIT	Formation integrity test
KB	Kelly bushing
MD	Measured depth
psi	Pounds per square inch
TD	Total depth
TVD	True vertical depth

**Drilling mud additives**

The MiSWACO Well Site Daily Cost Report for drilling mud additive additions dated 11/05/2019 was inspected. All additive additions recorded to date were found to be products agreed with the Environment Agency and listed in Appendix 5 of the Waste Management Plan RE-05-EPRA-WN-WMP Rev: 2 (as amended) [Environmental Permit conditions 2.1.1 and 2.3.1, and Tables S1.1 and S1.2].

 <b>Environment Agency</b>	<b>EPR Compliance Assessment Report</b>		Report ID: PP3833VA/0332764
	<b>This form will report compliance with your permit as determined by an Environment Agency officer</b>		
Site	West Newton Well Site EPR/BB3001FT	Permit	BB3001FT
Operator/ Permit	Rathlin Energy (UK) Limited	Date	13/05/2019

<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.