



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 | 06/06/2019 | | Time in | 11:00 | Out 13:45 |
| What parts of the permit were assessed | Engineering for prevention and control of emissions | | | | |
| Assessment | Audit | EPR Activity: | Installation: <input checked="" type="checkbox"/> | Waste Op: <input type="checkbox"/> | Water Discharge: <input type="checkbox"/> |
| Recipient's name/position | redacted | | | | |
| Officer's name | redacted | | Date issued | 14/06/2019 | |

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 | N |
| b) Infrastructure | |
| 1. Engineering for prevention & control of pollution | A |
| 2. Closure & decommissioning | N |
| 3. Site drainage engineering (clean & foul) | N |
| 4. Containment of stored materials | N |
| 5. Plant and equipment | N |
| c) General management | |
| 1. Staff competency/ training | N |
| 2. Management system & operating procedures | N |
| 3. Materials acceptance | N |
| 4. Storage handling, labelling, segregation | N |
| d) Incident management | |
| 1. Site security | N |
| 2. Accident, emergency & incident planning | N |
| 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 | 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

| | | | |
|------------------------------------|---|---|---|
| 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.

Record of environmental permit compliance audits carried out at the Rathlin Energy (UK) Ltd Beverley office on 06/06/2019 and 12/06/2019.

Present:

redacted

WNA-2 wellbore construction – WR11 requirements – Intermediate section

Documents 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.


Record of audit:

| WNA-2 WR11 Application supporting statement RE-05-EPRA-WNA-2-WR11 Rev:2 requirement | Documents inspected | Findings & notes |
|---|---|---|
| Surface Conductor (0 – 80m TVD KB) – Refer to CAR form PP3833VA/0332764r2 dated 13/05/2019 | | |
| Hole Section 17.5" (80m – 535m TVD KB) – Refer to CAR form PP3833VA/0332764r2 dated 13/05/2019 | | |
| Hole Section 12.25" (535m – 1538m TVD KB) | | |
| Section 5.2 page 9 A 12.25" (311.15mm) hole will be drilled from approximately 535m to 1,538m TVD KB using a KCl/NaCl polymer water based mud system. This section of the well will TD within the upper Permian section. The well will be drilled vertically and kick off from 860m TVD KB building to an angle of 14° on an azimuth of 65°. | WNA-2 Daily Operations Report no.46 for 02.06.19. | Current depth recorded as 1620m MD / 1603.96m TVD BRT. Last casing 9 5/8" recorded at 1519.6 BRT. Formation tops recorded as: Sherwood Sandstone 934.0 MD BRT, Basal claystone 1494.0 MD BRT, Roxby formation 1508.0 MD BRT, Sherburn Anhy 1558.6 MD BRT. |
| Section 5.2 page 9 Once this hole section has been drilled an 9.625" (244.5mm) casing will be run and cemented to at least 100m within the 13.375" (339.8mm) casing. The 9.625" | WNA-2 Daily Operations Report no.46 for 02.06.19. | Current depth recorded as 1620m MD / 1603.96m TVD BRT. Last casing 9 5/8" recorded at 1519.6 BRT. |
| (339.8mm) casing. The 9.625" | WNA-2 9 5/8" Casing tally dated 28.05.19 | Shoe bottom depth recorded as 1519.6m BRT. Casing joint |

| | | |
|--|--|--|
| <p>(244.5mm) casing will isolate the Sherwood sandstone from any hydrocarbon bearing reservoirs in the following section. Once cemented, the casing will be pressure tested to confirm its integrity.</p> | | <p>number 124 recorded at a depth of -1.03m BRT indicating the 9 5/8" casing was above the rotary table and the ground surface.</p> |
| | <p>WNA-2 Daily Operations Report no.42 for 29.05.19.</p> | <p>01:45 to 06:00 mix and pump 513 bbls of 12.5 ppg RHC cement slurry. Full planned volume pumped.</p> <p>06:00 to 07:45 Full returns at surface throughout job and cement contaminated spacer detected at surface indicating good cement column close to surface. Differential pressure prior to stopping 640 psi at 2 bpm.</p> |
| | <p>Rathlin Energy casing stretch calculator spreadsheet</p> | <p>Casing stretch calculation indicates the 9 5/8" casing is cemented to approximately 265m BRT giving 296m of cement within the 13.375" casing.</p> |
| | <p>Rathlin Energy 'West Newton A-2 cement calcs spreadsheet 28.05.29'</p> | <p>Calculated target differential pressure for cement to surface 460 psi.</p> <p>Differential pressure achieved prior to stopping 640 psi at 2 bpm.</p> |
| | <p>Rathlin Energy West Newton A-2 volume calculation spreadsheet</p> | <p>Volume calculations indicate when spacer fluid showed at surface cement was at approximately 229m TVD BRT giving 332m of cement within the 13.375" casing.</p> |
| <p>Once cemented, the casing will be pressure tested to confirm its integrity.</p> | <p>WNA-2 9 5/8" casing pressure test chart dated 31/05/2019</p> | <p>Low (5 minute/300 psi) and high (15 minute/4500 psi) pressure tests recorded. No loss of pressure recorded.</p> |
| <p>Section 5.2 page 9 A Formation Integrity Test will be carried out on the 9.625" (244.5mm) casing shoe immediately following the drilling out of the shoe, at the start of drilling the next hole section.</p> | <p>WNA-2 9 5/8" casing Formation integrity test (FIT) chart dated 02/06/2019</p> | <p>No loss of pressure recorded.</p> |

Key

| Abbreviation | Definition |
|--------------|--------------------------|
| bbls | Barrels |
| BGL | Below ground level |
| BRT | Below rotary table |
| FIT | Formation integrity test |
| MD | Measured depth |
| psi | Pounds per square inch |
| RHC | Rapid hardening cement |
| TD | Total depth |
| TVD | True vertical depth |

| | | | |
|---|---|-----------------------------|------------|
|  Environment Agency | EPR Compliance Assessment Report | Report ID: PP3833VA/0335353 | |
| This form will report compliance with your permit as determined by an Environment Agency officer | | | |
| Site | West Newton Well Site EPR/BB3001FT | Permit | BB3001FT |
| Operator/ Permit | Rathlin Energy (UK) Limited | Date | 06/06/2019 |

| Section 3- Enforcement Response | | Only one of the boxes below should be ticked | |
|---|--|---|--|
| 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. | | | |

| 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

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 major environmental effect | 60 |
| C2 | A non-compliance which could have a significant environmental effect | 31 |
| C3 | A non-compliance which could have a minor environmental effect | 4 |
| C4 | A non-compliance which has no 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. 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.