



Environment
Agency

Notice of request for more information

The Environmental Permitting (England & Wales) Regulations 2016

Alistair Stuart

Europa Oil & Gas Limited
54 Charlotte Street
London
W1T 2NS

Application number: EPR/YP3623LC/A001

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 30/04/2025.

Send the information to either the email or postal address below by 15/09/2025. If we do not receive this information by the date specified then we may treat your application as having been withdrawn or it may be refused.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: [REDACTED]

Postal address:

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

Name	Date
[REDACTED]	15/08/2025

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

- 1) Provide supporting evidence that potential land drains beneath the development have been considered and any mitigation measures proposed.

Reason: Land drains including disconnected drains can represent rapid preferential pathways for contamination to migrate away from the point of origin. Confidence is required that, if present, these have been considered in the design of the site and suitable mitigation measures are in place.

- 2) Provide details on the construction of the well cellar.

Reason: No details on the construction of the well cellar have been provided as part of the application. This information is required by gov.uk guidance and should include both the construction method and how it is adequately sealed. The Environment Agency notes that the application does state the integrity of the well cellar will be tested.

- 3) Provide supporting evidence demonstrating that the following additives contain only non-hazardous ingredients:

Provide details on the proprietary substance in:

- NUT PLUG
- Soltex

Provide JAGDAG assessment for:

- ECF-1882
- FORMABLOK AS
- Glydril MC (MIL091)
- Safe-Cor
- Safe-Scav-NA
- ULTRAFREE
- SAFE-SURF EU

SAPP, and FORM-A-BLOK and SAFE-SCAV HSN previously agreed at Glentworth

Advisory: We note the MSDS has changed for SOBOS GOLD 08. We are seeking clarification whether the ingredient which has changed is also non-hazardous.

Reason: The application states that all substances are non-hazardous however the additives listed above are not supported by sufficient evidence to reach this conclusion. We note that several parameters have previously been recorded as acceptable however insufficient information is contained in this application to reach the same conclusion.

Please note that the JAGDAG Assessment provided for the Proppant Squeeze is currently being reviewed by the Environment Agency's JAGDAG team and is not included in the assessment above.

Proppant squeeze

- 4) Provide a vertical image/section plan indicating the extent of the proppant squeeze.

Reason: The application refers to a various primary and secondary targets which are offset in the vertical axis. It is unclear which geological unit(s) the proppant will be undertaken in and how this relates to the estimated height of 40-80m. For example, the Kirkham Abbey Formation is described as a secondary target however there is >40m TVDS difference between this formation and the Primary Targets in the Carboniferous sandstones.

The plan should present, but not be limited to, the formations above and below the targeted horizons.

- 5) Provide a description of the methodology proposed to be used to assess, and ensure, the proppant squeeze is maintained within the proposed mining waste facility.

Reason: The application lacks sufficient detail about the chosen injection pressure and any modelling used to support the estimate of the proposed mining waste facility. More information is needed to provide confidence the proppant squeeze will be restricted to the mining waste facility and that fluids won't spread to adjacent formations.

- 6) Provide an assessment of the distances to geological faults relative to the wellbore and the proposed mining waste facility.

Reason: Faults have the potential to act as conduits for groundwater flow and additional information is required to understand the risks that the proposed proppant squeeze may have to groundwater in the geological faults in the sites geological stratigraphic sequence. Visual presentation of the distances from the wellbore of any faults would provide a greater understanding of these potential risks.

- 7) Confirm metrics for the stimulation activity, include supporting models, assumptions and documentation. Provide justification for the stimulation pressure.

Reason: A large range (40-80m) is presented for the height/zone of the stimulation activity and similarly a large range (100-200m) is presented for the radius/diameter of penetration. The situation described in the previous sentence lends to differing sizes calculated for the mining waste facility. Greater confidence is needed to support the stimulation pressure outlined, than is provided in the application.

Air Quality Assessment

- 8) Provide the model input files used for the predictions listed in the Air Quality Assessment (AQA).

Reason: We require the model input files to check the inputs used by the consultant, in accordance with our guidance (Environmental permitting: air dispersion modelling reports - GOV.UK, see “Include input files and input parameters”).

- 9) Provide:

- a) Actual oxygen (O₂) and moisture (H₂O) levels for all sources.
- b) Reference conditions for temperature, O₂ and H₂O that were used to calculate your emission rates, for example, “273K, 101.3 kPa, dry gas and 5% O₂”.

Reason: These parameters are required to demonstrate that the emissions used in the model are a valid representation of the operational scenarios being modelled in accordance with our Air Dispersion Modelling Reports guidance (linked previously, see “Explain emission parameters”).

- 10) Provide volumetric flow rates for all sources:

- a) Volumetric flow rate at actual conditions (m³/s)
- b) Volumetric flow rate at reference conditions (Nm³/s)

Reason: The consultant has not provided the volumetric flow rates at actual or reference conditions for any of the sources in their AQA report. Providing these is required as per our Air Dispersion Modelling Reports guidance (linked previously, see “Explain emission parameters”).

- 11) Provide emission concentrations (in mg/Nm³) for all modelled pollutants from all sources, **and/or** an explanation of how the modelled emission rates were calculated or derived.

Reasons:

- *We require the consultant to provide either the emission concentrations used to calculate the modelled emission rates and/or an explanation of how the modelled emission rates were calculated, in accordance with our Air Dispersion Modelling Reports guidance (linked previously, see “Explain emission parameters”) – “You must explain how you have worked out the emission rates used in your model. You need to demonstrate that the emissions are appropriate to the assessment purpose”.*
- *Providing datasheets for the modelled sources may be useful in supporting the consultant’s calculations or explanations.*

- 12) Provide an assessment of impacts at all local nature sites within 2 km of the modelled sources, including:

- a) Scarborough to Whitby Disused Railway Local Wildlife Site (LWS)

- b) Goose Dale & Quarry Banks LWS
- c) Cloughton Beck Marsh LWS

Reasons:

- *Our checks indicate that the consultant has not assessed impacts at Goose Dale & Quarry Banks LWS or Cloughton Beck Marsh LWS (within 2 km of the source locations) in their AQA report. Assessment of impacts at all local nature sites (including LWS) within 2 km of the source locations is required as per our Air emissions risk assessment for your environmental permit - GOV.UK guidance (see "Screening for protected conservation areas").*
- *The consultant's modelled receptor location for Scarborough to Whitby Disused Railway LWS does not fall within the boundary of this LWS.*