

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

Site	West Newton B Wellsite - EPR/WP3939RF		Permit Ref	DB3503HL	
Operator/ Permit holder	Rathlin Energy (UK) Limited				
Date	13/10/2020	Time in	10:30	Out	13:55
What parts of the permit were assessed	Management system, records of activity, waste storage				
Assessment	Audit	EPR Activity:	Installation	X	Waste Op
Recipient's name/position	redacted				
Officer's name	redacted		Date issued	16/10/2020	

Section 1 - Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations (EPR). 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 Condition	Compliance	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	A
	3. Materials acceptance	N
	4. Storage handling, labelling, segregation	A
d) Incident management	1. Site security	A
	2. Accident, emergency & incident planning	A
e) Emissions	1. Air	N
	2. Land & Groundwater	N
	3. Surface water	A
	4. Sewer	N
	5. Waste	A
f) Amenity	1. Odour	A
	2. Noise	N
	3. Dust/fibres/particulates & litter	A
	4. Pests, birds & scavengers	A
	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
MSA, MSB, TCM = Management System condition A, Management System Condition B and Technically Competent Manager condition which are environmental permit conditions from Part 3 of schedule9 EPR (see notes in Section 5/6).
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.

Present: Redacted

Objectives of visit: To audit compliance with management system procedures relating to the storage, handling, sampling, testing, characterisation, and removal of wastes produced on site. To inspect records relating to waste duty of care. To inspect records relating to the drilling operation for assessment against the requirements of the WNB-1 well WR11 notification.

Audit of management system procedures and records

A copy of the document 'Emergency Response Plan onsite guidelines' reference: RE-04-005 Rev6 dated 16/08/2020 was present in hard copy in the well site supervisor's office. It was reported that the 'competent person' responsibilities referred to in the plan are undertaken by the well site supervisor, or the tool pusher if the supervisor became unavailable as a result of an incident. It was reported that the security team will receive an additional briefing on the plan before drilling of the final section of the hole commences. Records relating to this will be checked during future EA audit.

Records in relation to water based drilling muds and salt saturated drilling muds removed from site were inspected. Waste duty of care paperwork, completed waste sampling records (document reference RE-05-FO-062) and waste classification records (document reference RE-05-FO-061) were present. The wastes had been assigned appropriate EWC (European Waste Classification) codes and the destination waste management sites were confirmed as authorised to accept the wastes.

The drilling mud spreadsheet 'Mud tracking Salt Sat v1' was inspected. The spreadsheet is used to record drilling mud chemical additions and mud removals so the potential build-up of properties within the mud that could exceed hazardous waste criteria can be identified. All potential properties were found to be either not present or well below hazardous waste thresholds.

Site inspection

The active area of the well site was inspected. The drilling rig and associated plant and equipment were present on site and drilling was ongoing. Fuel for the drilling rig was stored in two double skinned skid mounted tanks. Waste cement and drilling mud were stored in plastic lined open 8 cubic yard skips with no visible leakage. Drill cuttings were stored in a bulker skip. General waste, scrap metal, and empty drilling mud additive sacks were each stored in separate dedicated skips.

The open section of the perimeter containment ditch was inspected and the water was clear with no visible oil or grease present. The interceptor area was inspected and the inlet valve was in the closed position.

Inspection of records relating to drilling operations

Daily operations reports for drilling operations were inspected and assessed against the requirements of the WR11 notification for the WNB-1 well. The aspects inspected were compliant.

WNB-1 WR11 supporting statement RE-SD-WNB-EA-WR11-002 Rev1 requirement	Documents inspected	Findings and notes
Surface conductor (0-80 TVD KB) – refer to CAR form ref: WP3939RF/0373308 dated 17/09/2020		
Hole section 17.5" (80m – 555m TVD KB)		
A 17.5" (444.5 mm) hole will be drilled from 80m to approximately 555m to the top of the Lias Group using a bentonite polymer mud system.	Daily operations drilling report WNB-1 no. 21 for date 12.10.20.	Last casing: 13 -3/8" @ 561.75m MDBRT. Formation tops: Marl 490.0m MDBRT (tvdss – 469.7m), Carstone 493.0m MDBRT (tvdss – 472.7m), Lias 548.0m MDBRT (tvdss – 527.7m), Mercia mudstone 635.0m MDBRT (tvdss – 614.7m)
A 13.375" (339.8mm) casing will be run and cemented back to surface.	Daily operations drilling reports WNB-1 no. 21 for date 12.10.20. no. 17 for 08.10.20.	Casing run and cemented back to surface. Casing data: 13-3/8" casing 561.75m MDBRT. 'Cemented casing as per program, mixed and pumped a total of 406 bbls RHC at 12.5 ppg pumping at 5bpm, occasional fluctuations in returns seen during cement pumping at times but no losses observed.' 'Released top plug and displaced cement at 5bpm, reciprocating casing throughout displacement until cement returns observed at surface after pumping 153.8 bbls of displacement.'
Once cemented, the casing will be pressure tested to confirm its integrity.	Daily operations drilling report WNB-1 no. 21 for date 12.10.20. Pressure test chart.	Pressure test carried out. 'Increased pressure to 2000psi and held for 10 min to test casing – good test.'
A formation integrity test will be carried out immediately following the drilling out of the shoe, at the start of the next hole section	Daily operations drilling report WNB-1 no. 21 for date 12.10.20. Integrity test report.	Shoe drilled out and formation integrity test (FIT) carried out.

Abbreviations	
bbls	Barrels
bpm	Barrels per minute
EA	Environment Agency
MDBRT	measured depth below rotary table
ppg	Pounds per gallon
psi	Pounds per square inch
RHC	Rapid hardening cement
TVD KB	true vertical depth below kelly bushing
tvdss	true vertical depth sub sea
WNB	West Newton B

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.

**Non-compliance with MSA, MSB & TCM do not constitute an offence but can result in the service of a compliance, suspension and/or revocation notice.*

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

A breach of permit condition **MSA, **MSB** & **TCM** is not an offence but may result in the service of a notice requiring compliance and/or suspension or revocation of the permit.*

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.

MSA, MSB & TCM are conditions inserted into certain permits by Schedule 9 Part 3 EPR

MSA requires operators to manage and operate in accordance with a written management system that identifies and minimises risks of pollution.

MSB requires that the management system must be reviewed, kept up-to-date and a written record kept of this.

TCM requires the submission of technical competence information.

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?

You must notify your local officer within 28 days of receipt if, you wish to challenge any part of 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.