



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

Site	West Newton Well Site			Permit Ref	BB3001FT		
Operator/ Permit holder	Rathlin Energy (U K) Limited						
Date	10/09/2014			Time in	14:54	Out	16:37
What parts of the permit were assessed	See below						
Assessment	Site Inspection	EPR Activity:	Installation	Waste Op	X	Water Discharge	
Recipient's name/position	redacted						
Officer's name	redacted			Date issued	15/09/2014		

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	N
2. Closure & decommissioning	N
3. Site drainage engineering (clean & foul)	N
4. Containment of stored materials	N
5. Plant and equipment	A
c) General management	
1. Staff competency/ training	N
2. Management system & operating procedures	C3
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	C3
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	N
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	2	Total compliance score (see section 5 for scoring scheme)	8
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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.

Inspection in response to odour complaints received 09/09/2014 at 20:05 hrs and 10/09/2014 at 11:25 hrs NIRS ref: 01275977.

Present: redacted

Odour monitoring carried out with reference to Environment Agency 'H4 Odour Management' guidance document.

Weather conditions: dry/sunny

Temperature: Warm

Wind strength: Steady

Wind direction: From East / East South East

Time: 14:56 to 15:06 hrs. Location 2: Opposite Well Site Entrance. No odour detected.

Time: 15:07 to 15:17 hrs. Location 3: Pipers Lane approximately 50m West of Well Site Entrance (down wind). Intermittent hydrocarbon type odour present. Intensity: 3 - distinct odour. Receptor sensitivity: Low - road.

Time: 15:27 to 15:37 hrs Location 4: Field to the East of Well Site at site boundary adjacent to work over rig, (up wind). No odour detected.

Site inspection carried out. It was reported that the well was being 'swabbed' with all gas/liquids/solids removed being passed through the Expro well test equipment and separator. The flare was acting as a cold vent as the gas/atmosphere being brought up from the well had insufficient flow/calorific value to ignite.

The same hydrocarbon type odour detected at off site location 3 was present on the site. There was a strong hydrocarbon type odour on site down wind of the brine tanks, and when officers were leaving the site there was an extremely strong hydrocarbon type odour present on site immediately down wind of the flare stack.

The activities are giving rise to pollution outside the site due to odour (permit condition 3.3.1 and 3.3.2).

Possible sources of odour on site include: Green coloured brine storage tanks 1-5 with vents to atmosphere, wire line, cold venting via the flare, blue coloured open topped brine storage tanks (not in use at time of visit), oil/condensate tank vent to atmosphere, expro water tank vent to atmosphere.

Action 1: Carry out sampling and analysis of the release from the atmospheric vent of a brine tank whilst it is being filled with brine recently brought to the surface from the well. The purpose of the analysis is to identify the substances being released to atmosphere. The analysis must include as a minimum benzene, toluene, xylene, mercaptans, and organo sulphurous compounds. Data to enable the calculation of a release rate from the tank must also be recorded e.g. Tank fill rate during sampling period. Details of the proposed monitoring should be submitted to the Environment Agency prior to the monitoring being carried out. Timescale for monitoring to be carried out and

results submitted to Environment Agency: 19 September 2014

Action 2: Carry out sampling and analysis of the release from the flare stack whilst it is being used as a cold vent. The analysis must include as a minimum benzene, toluene, xylene, mercaptans, and organo sulphurous compounds. Data to enable calculation of a release rate from the vent must also be recorded. Details of the proposed monitoring should be submitted to the Environment Agency prior to the monitoring being carried out. Timescale for monitoring to be carried out and results submitted to Environment Agency: 19 September 2014

Action 3: Submit an odour management plan which identifies sources of odour and measures that will be taken to manage and minimise the risk of pollution from odour. Timescale: 19 September 2014



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

<p>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.</p>	
<p>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.</p>	<input type="checkbox"/>
<p>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.</p>	<input checked="" type="checkbox"/>
<p>We will now consider what enforcement action is appropriate and notify you, referencing this form.</p>	

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			
C2	C3	Refer to Actions 1 to 3 in section2	19/09/2014
F1	C3	Refer to Actions 1 to 3 in section 2	19/09/2014

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.

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.