

Dear Ada

Thank you for your enquiry received on 04 January 2018, ref: KSL 112967. We respond to requests for information under the Freedom of Information Act 2000 and Environmental Information Regulations 2004.

Please access the requested documents listed below via the Sharefile link, as these included large file sizes it was not possible to attach them. Please be aware that this link expires after 30 days.

<https://ea.sharefile.com/d-s0714b9335304f87b>

- Latest Waste Management Plan
- Latest Hydrological Risk Assessment
- Amendments to the Waste Management Plan or Hydrological Risk Assessment:
 - Acid wash schedule MSDS
 - Hot oil wash schedule MSDS
- De minimis proforma
 - Acid treatment
 - Hot oil washing
- Compliance Assessment Reports:
 - 11 Dec 2018 Pre-Op 01 Review and Update
 - 19 Dec 2018 Pre-Op 02
 - 20 Dec 2018 Pre-Op 03
 - 04 Dec 2018 site visit
 - 13 Dec 2018 site visit
 - 20 Dec 2018 site visit

Please see below for responses to your questions:

2. The new permit prohibited the practice of water re-injection at Brockham of waste water produced at Brockham and Lidsey. I understand that the EA did not require the reporting of volumes, times and pressures or other details water of re-injected at Brockham, either from each source or total. Can I please also request clarification on:

a) When EA approved this practice originally for water produced at Brockham

The original permit BL9763, issued for the site at Brockham and determined on 19 September 2002, included 'Re-injection of produced water into reservoir' under Schedule 1 of the Regulations/ Associated Activity, shown in Table 1.1 of the permit.

b) when EA approved this practice originally for water produced at Lidsey

The practice of bringing produced water from Lidsey to the Brockham site was first included in variation notice EP3238UM, which was determined 03 July 2007. 'Receipt and storage of produced water from Lidsey Oilfield' is listed under Schedule 1 of the Regulations/ Associated Activity, shown in Table 1.1 of the variation to the permit.

The introductory note states: "The operator has recently obtained a PPC permit to operate a further oilfield at Lidsey. This site has no second well for return of the produced water and the application for this variation is to allow the produced water at Lidsey to be brought onto the Brockham site for return to the Brockham reservoir using the existing produced water tank, return water pump and return well."

c) records of volume of water produced and injected shared on the OGA portal indicate that not all water produced was reinjected. Does the EA have knowledge of what happened to the water that was not reinjected?

Under the previous environmental permit for Brockham, we did not require the operator to provide the information that would allow us to verify the figures supplied to the OGA. Therefore we do not hold these records and exception 12(4)(a) applies. Please see appendix for details.

d) has the EA carried out any tests of water reinjected at Brockham to check for NORM and toxicity? No, this testing has not been carried out by the Environment Agency.

e) which treatment facility is waste/produced water be tankered to from Brockham going forward? what reporting will the EA receive?

The operator is not required to nominate specific sites. They must use a suitably permitted facility and comply with the relevant waste management legislation in terms of record keeping.

Please refer to the [Open Government Licence](#) which explains the permitted use of the information provided.

If you have any further queries or if you'd like us to review the information we have provided under the Freedom of Information Act 2000 and Environmental Information Regulations 2004, please contact us within two months and we will happily do this for you.

Regards

KSL Customers and Engagement Team

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Appendix

EIR Regulation 12(4)(a)

Where a request is for environmental information, the regulations allow us to refuse to disclose it if the exception at EIR Regulation 12(4)(a) applies. The regulation states that a public authority may refuse to disclose environmental information to the extent that it does not hold that information when an applicant's request is received. As a public body we are required under the Freedom of Information Act 2000 and Environmental Information Regulations 2004 to give reasons for this refusal. It is not possible for us to conduct a public interest balancing test because the reason for non-disclosure is that the information is not held.