

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

Site	West Newton B Wellsite - EPR/DB3503HL	Permit Ref	DB3503HL		
Operator/ Permit holder	RATHLIN ENERGY (UK) LIMITED				
Date	07/05/2021	Time in	09:00	Out	11:20
What parts of the permit were assessed	Records				
Assessment	Audit	EPR Activity:	Installation	X	Waste Op
Recipient's name/position	redacted				
Officer's name	redacted			Date issued	24/05/2021

### 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
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)	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	A	
	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**

**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).**

<b>Number of breaches recorded</b>	0	<b>Total compliance score</b> (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 Location: Rathlin Energy office Beverley.

Audit objective: To inspect records relating to the WNB-1z well drilling operation for assessment against the requirements of the WNB-1z well WR11 notification.

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

WNB-1z WR11 supporting statement RE-SD-WNB-EA-WR11-002 Rev2 requirement	Documents inspected	Findings and notes
<b>Surface conductor (0-80 TVD KB) – refer to CAR form ref: WP3939RF/0373308 dated 17/09/2020</b>		
<b>Hole section 17.5" (80m – 555m TVD KB) – refer to CAR form ref: WP3939RF/0375026 dated 13/10/20</b>		
<b>Hole Section 12.25" (555m – 1524m TVD KB) – refer to CAR form ref: WP3939RF/0378349 dated 12/11/2020</b>		
<b>Hole Section 8" (1524 -2067m TVD KB)</b>		
The 8.5 (215.9mm) hole will continue at an angle of 42° from an approximate depth of 1524m TVD KB to a depth of 2067m TVD KB using a KCL/NaCL polymer water based mud system and will TD in the Base Permian or top Carboniferous section	Daily operations report drilling operations report WNB-1 no. 57 for date 17.11.20 and no. 58 for date 18.11.20	TD 2295m MDBRT. Last casing 1559.22m MDBRT
A cement plug shall be placed from TD of the well across the Rotligendes formation with at least 100ft of good cement above the Rotligendes formation	Daily operations report drilling operations report WNB-1 no. 58 for date 18.11.20 and no. 59 for date 19.11.20  Lithology log WNB-1 L46/10-2	18.11.20 set cement plug #1 from 2290m to 2046m (MDBRT)  19.11.20 Ran in hole from 2043m to tag top of cement with 8k at 2108m (MDBRT)  Lithology log total depth 2295m MDBRT, Rotligendes formation top 2212.5 m MDBRT.  EA note: Cement plug set with greater than 100ft (30.48m) cement above Rotligendes formation top
A second cement plug, of at least 100ft of good cement, shall be placed over the 9.625" casing shoe to isolate the Sherwood Sandstone formation from the Permian formations below.	Daily operations report drilling operations report WNB-1 no. 44 for date 04.11.20, no. 58 for date 18.11.20 and WNB-1 no. 59 for date 19.11.20	19.11.20. Set cement plug #2  20.11.21 Ran in hole from 1259m to tag depth of 1445m.  Tested cement plug to 1580 psi.  04.11.20 Formation tops: Sherwood

		<p>sandstone 931.1m MDBRT, Roxby formation 1539m MDBRT</p> <p>18.11.20 TD 2295m MDBRT. Last casing 1559.22m MDBRT</p> <p>EA note: Cement plug set with greater than 100ft (30.48m) cement above the casing shoe</p>
<b>Sidetrack 8" hole section (962m – 1507m TVD KB)</b>		
A window shall be milled through the 9.625" casing by setting a whipstock to allow the section to be drilled directionally away from the original wellbore to a depth of 2018m TVD KB using a KCL/NaCl polymer water-based mud system to the top of the Permian.	Daily operations report drilling operations report WNB-1 no 63 for date 23.11.20	23.11.20 Mud type: NaCl KCl Sat
Once the section has been drilled, 7" casing shall be installed and cemented to at least 100m within the 9.35" casing. The 7" casing will be pressure tested to confirm its integrity. This 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>Daily operations report drilling operations report WNB-1 no 67 for date 27.11.20</p> <p>Schlumberger WNB-1z Cement Job Report 27/11/2020 for 7" casing</p>	<p>27.11.20 Midnight depth: 1541m. Last casing: 7" casing at 1538.85m BRT.</p> <p>EA notes: Cement mixed and pumped. Cement returns observed at surface.</p> <p>Casing pressure tested to 4500 psi</p>
A formation Integrity Test (FIT) or Leak Off Test (LOT) will be carried out immediately following the drilling out of the shoes, at the start of the next hole section.	<p>Daily operations report drilling operations report WNB-1 no 70 for date 30.11.20</p> <p>Rathlin Energy Formation Integrity Test Chart WNB-1z 7" casing 30/11/2020</p>	DORDR 30.11.20 02:00 to 03:33 Performed FIT against the VBRs, choke manifold valves 1,2&3 to EQMW 14.6 ppg, MW in hole 10.7 ppg, TVD 1506.31 shoe depth. 69 Bar held for 15 min. No leak off seen
<b>Hole Section 6" (1507m – 2018m TVD KB)</b>		
The 6" hole section will continue at an angle of 25° to an approximate depth of 2018m TVD KB using a KCL/NaCl polymer based mud system and will TD in the Base Permian or top of Carboniferous.	Daily operations report drilling operations report WNB-1 no 79 for date 27.11.20	<p>Mud type: NaCl KCl Sat</p> <p>Midnight depth: 2114m</p> <p>Carboniferous formation top 2063.0 MDBRT</p>
A 4.5" casing liner shall be run and cemented in place with the hanger at least 100m within the 7" casing. Any permeable formations encountered within this hole section will be isolated from any subsequent operations.	<p>Daily operations report drilling report WNB-1 no. 80 for date 10.12.20</p> <p>WNB1 Casing Tally</p> <p>Schlumberger WNB-1z Cement Job Report 27/11/2020 for</p>	<p>DORDR 10.12.20 Last casing: 4 ½" liner at 2110.3m BRT. Top of liner at 1323.5m BRT</p> <p>Casing Tally: 7" shoe set at 1549m MDBRT, 4.5" liner top at 1330 m MDBRT</p> <p>EA note: 4.5" liner is hung off 7" casing</p>

The 4.5" casing will be pressure tested to confirm its integrity.	4.5" production liner  Rathlin WNB-1z End of well report	<p>DORDR 10.12.20 EA notes: Cement mixed and pumped. Cement displaced with spacer and brine. Well displaced with inhibited CaCl brine. Observed spacer after 75bbls pumped, cement after 100bbls pumped (indicating cementing of the 4.5" liner extended greater than 100m within 7" casing as cement entered the 7" casing).</p> <p>End of well report: 4.5" liner - 55% excess cement pumped.</p> <p>Schlumberger report: Casing pressure tested to 3500 psi</p>
---	--	--

  

Abbreviations	
bbls	Barrels
csg	Casing
EA	Environment Agency
MDBRT	measured depth below rotary table
TVD KB	true vertical depth below kelly bushing
tvds	true vertical depth sub sea
WNB	West Newton B

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><i>*Non-compliance with MSA, MSB &amp; TCM do not constitute an offence but can result in the service of a compliance, suspension and/or revocation notice.</i></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.	<input type="checkbox"/>
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.	<input type="checkbox"/>
We will now consider what enforcement action is appropriate and notify you, referencing this form.	<input type="checkbox"/>

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 <b>major</b> environmental effect	60
C2	A non-compliance which could have a <b>significant</b> environmental effect	31
C3	A non-compliance which could have a <b>minor</b> environmental effect	4
C4	A non-compliance which has <b>no</b> 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](mailto: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.