



Ref: KSL 119481  
Date: 29 March 2019

Dear Emily

Thank you for your enquiry received on 28 February 2019, ref: KSL 119481. We respond to requests for information under the Freedom of Information Act 2000 and Environmental Information Regulations 2004.

Please see responses to your questions below.

Please can you send me the data from the Horse Hill site operated by HHDL/UKOG on the volume of both solid and liquid waste taken from the Horse Hill site during drilling and subsequent flow testing.

It is not possible to provide this requested data specific to the drilling phase and flow testing phase as this is information that we do not hold. Therefore under the Environmental Information Regulations 2004, exception 12(4)(a) applies. Please see appendix for further details. However, please refer to the operator's Waste Management Plan attached, which sets out estimated waste quantities, classifications and controls.

What was composition of the waste water and solid waste taken during drilling and flow testing and how was it disposed of?

It is not possible to provide this requested data specific to the drilling phase and flow testing phase as this is information that we do not hold. Therefore under the Environmental Information Regulations 2004, exception 12(4)(a) applies. Please see appendix for further details. However, please refer to the operator's Waste Management Plan attached, which sets out estimated waste quantities, classifications and controls, including information about how the waste is disposed of.

Were there any NORMs in either liquid or solid wastes ?

It is not possible to provide this data as this is information we do not hold. Therefore under the Environmental Information Regulations 2004, exception 12(4)(a) applies. Please see appendix for further details.

The operator has a permit allowing them to store on site and dispose of waste containing Naturally Occurring Radioactive Material (NORM), this is within the limits of NORM associated with oil and gas production. For further information, please find attached the Standard Rules permit (AB3498DZ) for the accumulation and disposal of radioactive waste from the NORM Industrial Activity of the production of oil and gas. There is also further information about NORM in the Waste Management Plan attached (chapter 3, section 5).

Did the EA inspect the waste(s) or do you rely on self inspection?

The operator is required to keep records including waste transfer notes, which we review at site inspections. Please see attached Compliance Assessment Reports (CAR) from site visits that took place on 29/06/2018 and 23/08/2018, which confirm that the only chemicals found on site matched those listed in the Waste Management Plan. Section 2 of the CAR from the 23/08/2018 visit provides information about the waste returns and transfer notes. Please also find attached the permit (BB3300XG).

We require the operator to self-monitor to ensure that they are complying with their waste management plan, and therefore do not carry out our own testing or inspection of waste. We are satisfied that the Waste Management Plan supplied by the operator clearly sets out the activities proposed and risk management measures in place, including the details of the fluids and chemicals to

be used. As part of their self-monitoring, the operator is required to notify us of any instances of non-compliance.

Which company is responsible for taking the waste away from the site and how do they process this? Which facility accepted the waste and what is the ultimate fate of the liquid and solid waste from the Horse Hill site?

The operator must use a suitably permitted waste facility and comply with the relevant Waste Management Legislation in terms of record keeping. The operator is not required to nominate specific sites, therefore the specific waste facility or facilities they have used and the treatment of the waste is information we do not hold. Therefore under the Environmental Information Regulations 2004, exception 12(4)(a) applies. Please see appendix for further details.

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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#### **Attached**

- Environmental permit (BB3300XG)
- Radioactive Substances Regulation environmental permit (AB3498DZ)
- Waste Management Plan
- Compliance Assessment Report 29/06/18
- Compliance Assessment Report 23/08/18

#### **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.