

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

Site	Brockham Oilfield			Permit Ref	403648		
Operator/ Permit holder	Angus Energy Weald Basin No.3 Ltd						
Date	26/01/2017			Time in	09:28	Out	13:19
What parts of the permit were assessed	Inspection						
Assessment	Site Inspection	EPR Activity:	Installation	Waste Op	X	Water Discharge	
Recipient's name/position	MD						
Officer's name	Installations officer & GWCL officer			Date issued	03/02/2017		

**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**

<b>a) Permitted activities</b>	1. Specified by permit	A	
<b>b) Infrastructure</b>	1. Engineering for prevention & control of pollution	A	
	2. Closure & decommissioning	N	
	3. Site drainage engineering (clean & foul)	A	
	4. Containment of stored materials	C3	Condition 2.3.1
	5. Plant and equipment	A	
<b>c) General management</b>	1. Staff competency/ training	N	
	2. Management system & operating procedures	N	
	3. Materials acceptance	N	
	4. Storage handling, labelling, segregation	A	
<b>d) Incident management</b>	1. Site security	A	
	2. Accident, emergency & incident planning	N	
<b>e) Emissions</b>	1. Air	N	
	2. Land & Groundwater	N	
	3. Surface water	N	
	4. Sewer	N	
	5. Waste	N	
<b>f) Amenity</b>	1. Odour	A	
	2. Noise	A	
	3. Dust/fibres/particulates & litter	A	
	4. Pests, birds & scavengers	A	
	5. Deposits on road	A	
<b>g) Monitoring and records, maintenance and reporting</b>	1. Monitoring of emissions & environment	N	
	2. Records of activity, site diary, journal & events	N	
	3. Maintenance records	N	
	4. Reporting & notification	N	
<b>h) Resource efficiency</b>	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**

1

**Total compliance score**  
(see section 5 for scoring scheme)

4

**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 on site:

Angus Energy: MD & well service contractors

EA: Installations officer & GWCL officer

HSE: Inspector (x2)

SCC: Planning officer (x2)

### Operations on site

Verbal indication was provided on site that a sidetrack had been drilled off Brockham well 4, with work beginning 21/01/17. This operation is permitted under the Standard Rules Permit SR2015 No 1 (EPR EB3604MZ/ EAWML 403648). Operations were complete on site and equipment was being removed offsite on the day of inspection. The rig was due to come down imminently.

### Amenity

There was no odour or noise observed outside of the permitted boundary. There was no significant litter or dust observed on or offsite. There were no pests observed on or offsite. There were no significant deposits observed on the road (from the north via Brockham village) or the access track road to the site observed.

### Housekeeping and tertiary containment

There were numerous stained areas onsite where oil has appeared to penetrate into the surface/made ground. These were particularly evident in areas in front of the tanker loading bay and another in front of the main tank bund.

Please ensure appropriate measures are taken to ensure operations are undertaken in a manner that prevents any spills or leaks on site (as per Section 6 of the Waste Management Plan (WMP)).

It was noted that in another area oily pipes were laid on plastic tarpaulin to provide additional pollution prevention.

**Action 1:** Please submit documentation to confirm the extent and integrity of the impermeable membrane on site (as required under Condition 2.3.1 and 2.3.2, with reference in particular to 6.2 of the WMP). Please submit this information by **24/02/2017**.

Note: This information was previously requested, not yet submitted, under Permit BL9763IN. Please see CAR 0275884 and CAR 0273891 (Action 6 & 7).

**Action 2:** Please ensure that areas where the surface/made ground is contaminated with oil is cleared and the material is disposed of at an appropriately permitted waste facility. This may be reviewed on site at a future site inspection.

### Site containment

Chemicals including Oil Based Drilling Mud (OBDM) additives, hydraulic oils, lubricants etc. were observed to be stored in secondary containment as required.

As per Condition 2.3.1, with reference to WMP Section 7, containment on site must be in line with CIRIA C736. The construction standard of the secondary containment bund remains under review pending further considerations with the operators structural engineering contractors for the works.

Condition 2.3.1 with reference to Site containment 6.3 of the WMP requires that only covered skips and enclosed

tanks are used for the temporary storage of extractive wastes on site. During the site inspection a large uncovered skip of extractive waste was observed to be stored on site (in front of the firewater tank, by the recycling and general waste skips). This is a breach of permit under the condition 2.3.1 (WMP Site containment 6.3) incurring a **CCS 3**.

A leakage was observed from the base of the skip onto the surface/made ground. The extent of the impermeable membrane is not known on this area where the skip was held (addressed under Action 1).

**Action 3:** Please review the temporary storage of extractive waste on site to ensure that the storage is appropriate going forward and it is in an appropriately designated area.

**Action 4:** Please ensure any spills are cleared as soon as possible.

**Action 5:** Please submit a copy of the waste transfer note providing confirmation that this waste have now been removed offsite appropriately to an appropriate facility. Please submit this by **24/02/2017**.

Note: If this information is provided to, or reviewed on site by, the Environment Agency in advance of this submission deadline for the purpose of another inspection then please simply indicate the reference to close out.

#### Chemicals and Groundwater Protection

A list of chemicals used by the well service contractors on behalf of the operator was provided on site. A review of this inventory indicates that OBDM constituents appear to be in line with the WMP requirements. However the quantities used on site will be required to confirm this.

**Action 5:** Please submit the component quantities of OBDM used to ensure compliance with the WPM (Annex 1). Please submit this by **24/02/2017**.

Condition 2.3.1 with reference to WMP Well Cementing 6.1 requires that a recognised cement standard of API 10 or equivalent is used in well cementing operations.

**Action 6:** Please provide confirmation that an appropriate cement standard was used in the recent operations. Please submit this by **24/02/2017**.

Condition 2.3.1 with reference to the WMP Well Cementing 6.2 requires cement evaluation logs are made available for inspection on request in order provide assurances that appropriate protection is maintained through the groundwater-bearing formations.

**Action 7:** Please provide a cement bond logging summary for the operations. Please submit this by **24/02/2017**.

#### Emissions testing

Condition 2.3.1 with reference to WMP Borehole testing 6.3 and 6.5 requires gas monitoring at the well head and well bore returns.


**Action 8:** Please submit a summary of monitoring results for the gas monitoring carried out on site at the well head and well bore returns. Please submit this by **24/02/2017**.

#### Drainage

In the sites internal surface water drainage ditch, specifically in the chamber that houses the valve prior to where the site surface water would drain to the oil interceptor, there appeared to be a small trickling flow. This flow was not coming from the internal drainage ditch. It appeared to be infiltration of water from surrounding soils/land with preferential flow being enabled through a potential gap around the end of the internal drainage ditch pipe as it meets the final chamber. This water drainage was clear. The valve to the oil interceptor appeared to be shut but this could not be confirmed based on the above ground valve lever position.

**Action 9:** Please carry out an investigation into the containment integrity of the internal drainage ditch final chamber. Should any fractures in the containment be detected please ensure these are appropriately sealed as soon as possible. Please submit an update on the outcome of this investigation by **24/02/2017**.

END

 <b>Environment Agency</b>		<b>EPR Compliance Assessment Report</b>		Report ID: 403648/0278191	
<b>This form will report compliance with your permit as determined by an Environment Agency officer</b>					
Site		Brockham Oilfield		Permit 403648	
Operator/ Permit		Angus Energy Weald Basin No.3 Ltd		Date 26/01/2017	

<b>Section 3- Enforcement Response</b>		<b>Only one of the boxes below should be ticked</b>	
<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>			
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 checked="" type="checkbox"/>
We will now consider what enforcement action is appropriate and notify you, referencing this form.			<input type="checkbox"/>

<b>Section 4- Action(s)</b>			
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.			
<b>Criteria Ref.</b>	<b>CCS Category</b>	<b>Action Required / Advised</b>	<b>Due Date</b>
See Section 1 above			
B4	C3	See body of text.	24/02/2017

## 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**

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.

## 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](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.