

Permitting decisions

Variation to permit

We have decided to issue the variation for Crosby Warren Wellsite operated by Europa Oil & Gas Limited.

The variation number is EPR/GP3635MP/V003

We have also carried out an Environment Agency initiated variation to the permit.

We consider in reaching that decision we have taken into account all relevant considerations and legal requirements and that the permit will ensure that the appropriate level of environmental protection is provided.

This variation is required as the Environment Agency has a duty, under the Environmental Permitting (England and Wales) Regulations 2016, regulation 34(1), to periodically review permits. As a result of that review we have identified a number of necessary changes we must make to the permit to reflect current legislation and best practice. These changes principally relate to:

- Implementation of the Mining Waste Directive namely the addition of extractive waste management activities;
- Addition of a groundwater activity; and
- Oil storage activities.

The variation also aims to:

- Consolidate all previous variations to the original permit so as to bring them together into one permit so the requirements will be clearer.
- Formalise changes to monitoring requirements and compliance limits where we have agreed them in writing, for example as the result of an environmental risk assessment review.
- Address site specific issues which result in a change to the current permit, for example incorporating completed improvement conditions into the permit and removing inconsistencies.

Purpose of this document

This decision document provides a record of the decision making process. It summarises the decision making process in the decision checklist to show how all relevant factors have been taken in to account.

This decision document provides a record of the decision making process. It:

- highlights key issues in the determination
- summarises the decision making process in the [decision checklist](#) to show how all relevant factors have been taken into account
- explains why we have also made an Environment Agency initiated variation
- shows how we have considered the [consultation responses](#).

Unless the decision document specifies otherwise we have accepted the applicant's proposals.

Read the permitting decisions in conjunction with the environmental permit. The introductory note summarises what the permit covers.

Brief outline of proposed process

The installation comprises a single site with two production wells, a re-injection well and storage tanks with associated bunding and containment facilities and is located to the North East of Scunthorpe. The site draws oil and admixed water from the Crosby Warren oilfield.

Crude oil and admixed water is passed through a process heater and separator. Crude oil, from the separator is pumped to storage tanks via over ground pipelines. Produced waters and storm waters collecting on the process areas are re-injected into the oil producing reservoir using the injection well. The storage tanks are emptied as required by road tanker. Power for the installation is supplied by an on-site diesel generator. Associated gas, released when the oil is depressurised, is used to fuel the onsite process heater and separator and is also exported to the nearby steel works where it is used in coke ovens. The site takes up an area of 0.6 Hectares in total with a daily oil production of approximately 23 bbls (2017 average).

Mining waste is generated from routine well maintenance activities and well work overs. During the abstraction process wax and scale can precipitate from the well fluids and be deposited on the walls of the tubing, casing, rods and pumps. The deposition if left untreated will result in poor production efficiency and mechanical failure of the pumping system. Typical mechanical failures include broken rods, seized pumps and plugged tubulars. To prevent the loss of produced fluids and mechanical failures well maintenance activities are routinely carried out on the pumping systems. These include Hot water washing, hot oil washing, wax dissolver treatment and acid treatment

In all cases these treatments involve circulating fluids around the well pumping system to dissolve the build-up of these deposits. All fluids are fully recovered at the surface. The treatments are essential to keep oil production going.

The principal releases into the environment comprise:

- (a) Emissions to air of gaseous hydrocarbons from separation of volatiles in storage.
- (b) Emissions of gaseous hydrocarbons from the road tanker by displacement on loading.
- (c) Rainwater run-off from hardcore well-site areas to ground.

(d) Engineering waste resulting from maintenance work is removed for disposal at a licensed waste disposal facility.

The Risby Warren SSSI is 620 metres to the NE of the installation and there are no Habitats sites within 10 Km of this site.

Description of the changes introduced by the variation

This is a normal variation to add the following activities

1) A Mining Waste Operation, as defined by the Mining Waste Directive and Schedule 20 of the Environmental Permitting (England and Wales) Regulations 2016, as amended, relating to the management of extractive waste not involving a Mining Waste Facility. The permit is being varied to include activities specified in the approved Waste Management Plan and these include management of extractive mining wastes from near well-bore treatments involving acid-squeeze, hot oil wash, and scale removal and well workover operations.

2) A groundwater activity, as defined by the Groundwater Directive and Schedule 22 of the Environmental Permitting (England and Wales) Regulations 2016, as amended, for the re-injection of produced and clean surface waters for production support.

The original permit was issued for an Industrial Emission activity as defined by the Industrial Emissions Directive and Part 2 Schedule 1.2 of the Environmental Permitting (England and Wales) Regulations 2016, as amended, relating to the loading, unloading, handling and storage of crude oil.

In order to permit the re-injection of produced water to the ground, an environmental permit for a groundwater activity is required. Where it is proposed to convert a production well to a re-injection well for the re-injection of produced water to ground, an environmental permit for a groundwater activity is required. This permit requires the applicant to have provided a detailed hydrogeological risk assessment, or equivalent document, prior to the commencement of the operations, which the Environment Agency must be satisfied with. The groundwater activity permit will need to be granted prior to the use of the wells for injection purposes and be agreed and issued with a condition that requires the operator to **submit a notification** to the Environment Agency prior to the conversion. The activity must not take place until the operator has received written approval from the Environment Agency of the request for a change contained within the notification.

The operator will need to confirm that the conditions relevant to the groundwater activity on the permit have been complied with prior to the operation of the well for reinjection purposes.

Key issues of the decision

For clarity a permit subject to the Mining Waste Directive covers the management of extracted waste and not the oil extraction process. This variation does not permit any hydraulic fracturing. We have specified this limit in Schedule 1 of the permit under Table S1.1, activity A3.

The Operator may also undertake near wellbore treatments during the lifetime of hydrocarbon production from the well, as part of routine maintenance activities. These will include hot water washing, hot oil washing, wax dissolver treatment and acid treatment.

The purpose of hot water washing and hot oil washing is to remove the build-up of paraffin precipitates. The process involves circulating hot oil or heated produced water down the well, to the production tubing above the perforations and is circulated back to the surface. Paraffin precipitates dissolved in the hot water or hot oil at the surface are passed through a free phase

separator and directed to on-site storage tanks. The hot water wash and hot oil wash does not have any contact with the reservoir formation and does not pose a risk to groundwater.

The purpose of the acid wash and squeeze is clean out existing natural fractures in the Rough Rock and Beacon Hill Flags which have been blocked during the production of hydrocarbons. 15% Hydrochloric acid with water is circulated down the well and across the perforated sections of the well. Acid may then be selectively pushed into the near wellbore area. The acid reacts with the minerals in the formation and all spent acid is recovered to the surface. We have considered the acid wash and squeeze treatment as described in the waste management plan and concluded that it meets the ground activity exclusion as described in Schedule 22 Paragraph 3.3(b) of the Environmental Permitting Regulations.

Groundwater Activity

A groundwater activity, in general terms, is defined in Schedule 22 of the 2016 Regulations as meaning the discharge of a pollutant that results in the direct input of that pollutant to groundwater, or a discharge of a pollutant in circumstances that might lead to an indirect input of that pollutant to groundwater or any other discharge or activity that might lead to a direct or indirect input of a pollutant to groundwater.

The groundwater activity for this site is to re-inject produced water resulting from the extraction of hydrocarbons into the Beacon Hill Flags, part of the Millstone Grit Group. The Beacon Hill Flags are approximately 1510m deep and contain groundwater.

The discharge is a direct discharge to groundwater which is prohibited under by the Water Framework Directive except under certain exemptions. One of these exemptions is:

The injection of water containing substances resulting from the operations for exploration and extraction of hydrocarbons or mining activities, and injection of water for technical reasons, into geological formations from which hydrocarbons or other substances have been extracted or into geological formations which for natural reasons are permanently unsuitable for other purposes, provided that the injection does not contain substances other than those resulting from the above operations

We are satisfied that this activity meets the above exemption. A permit can only be granted provided it does not compromise the achievement of any of the environmental objectives relating to groundwater in Article 4 of the Water Framework Directive. We have given detailed consideration to the proposal and we are satisfied that none of the relevant environmental objectives set out in Article 4 of the Water Framework Directive will be compromised.

We have reviewed the Hydrogeological Risk Assessment and Site Condition Report submitted with the supporting documents against our information and conceptual understanding of the location. We are satisfied that the potential risks to groundwater have been identified and addressed through mitigation measures and controls specified in this permit.

If the Applicant wishes to carry out different or additional activities not covered by this permit, a further variation of the permit will be required. Any such variation application would be determined on its merits and would be subject to our normal consultation process. Any further application to vary operations to manage mining waste will require an amended waste management plan to be submitted.

Except where a permit condition imposes a different requirement, the permit requires the Operator to comply with the techniques in the waste management plan (WMP) and limits the activities to those stated unless otherwise agreed in writing by the Environment Agency. We will authorize only minor amendments to the WMP without the need to vary the Permit.

The Permit includes conditions taken from our standard environmental permit template including the relevant Annexes. We developed these conditions in consultation with industry, having regard to the legal requirements of the Environmental Permitting Regulations, Mining Waste Directive, Industrial Emissions Directive, Groundwater Directive, Water Framework Directive and other relevant legislation.

This document does not therefore include an explanation for these standard conditions. Where they are included in the permit, we have considered the Application and accepted that the details are sufficient and satisfactory to make the standard conditions appropriate.

Improvement Programme

We have imposed improvement conditions for the following reasons

1) Secondary and tertiary containment - Improvement condition IC1

Improvement condition IC1 is necessary to ensure that secondary and tertiary containment systems meet the standards required of a new oil and gas site. This will reduce the likelihood of any uncontrolled polluting discharges to the environment.

2) Leak detection and repair plan - Improvement condition IC2

A leak detection and repair plan is needed to manage fugitive VOC emissions from potential leak points such as seals, flanges, pumps and valves. This standard technique is a method for identifying and prioritising potential sources of leaks, developing a leak detection and repair programme using the monitoring standard EN 15446 including assessing reductions in emissions resulting from the programme and estimation/calculation of any residual emissions. The EN 15446 method is described in the Refineries BRef (2015) as an available method for carrying out monitoring of fugitive emissions. Alternative but equivalent methods can be proposed.

3) Groundwater Monitoring Plan – Improvement condition IC3

Improvement condition IC3 is necessary because the groundwater monitoring plan requires review, updating, and formalising. The groundwater monitoring plan, once approved, shall be incorporated into the permit as an operating technique.

Groundwater Monitoring is necessary to help determine whether the reinjection of produced water is affecting the quality of groundwater and whether satisfactory measures are being undertaken to prevent groundwater pollution. Groundwater monitoring is required for the purposes of requisite surveillance in accordance with the Environmental Permitting Regulations 2016. The submission of a groundwater monitoring plan will ensure that groundwater monitoring is based on the site conceptual model and hydrogeological risk assessment.

4) Updated written Environment Management System – improvement condition IC4

Improvement condition IC4 is necessary as based on the information submitted with the application we have identified a number of procedures that do not appear to be in place.

This improvement condition requires the relevant procedures to be written into the Operator's management system, and to be adhered to. The management system will be subject to usual compliance audit in future.

5) Gas Management Plan – Improvement condition IC5

Although gas produced from the site is used at the adjacent steel works, there may be times when outages at the steelworks results in gas not being utilised. Improvement condition IC5 is necessary as the operator does not appear currently to be applying best available techniques for the management of waste gas arising from their production of hydrocarbons in the event of the steel works being unable to take gas produced from the site.

Gas management is required as the impact of releasing large quantities of uncombusted hydrocarbons leads to a significant environmental impact which can be readily mitigated using available techniques.

We have included improvement condition 5 which requires the operator to submit for written approval a plan identifying their identified method for reducing the impact of gas emissions to atmosphere.

Gas management is necessary to reduce the environmental and human health impacts of emitting natural gas directly to atmosphere.

6) Air emissions monitoring – Improvement condition IC6

Improvement condition 6 is necessary as the site features emissions to air with the potential to cause pollution. We have applied improvement condition 6 to require the operator to undertake appropriate emissions monitoring from [each of] the emission point[s] on the site to understand the current performance of the process / equipment which gives rise to the emission. We will use the results of this monitoring to determine whether the operator's processes and equipment minimises the emission to air to as low as reasonably achievable in line with best available techniques. We expect the Operator to use these monitoring results when responding to IC 5 to ensure they are applying [appropriate measures / best available techniques] for the management of waste gas arising from their production of hydrocarbon.

Where appropriate, we will use these monitoring results to set appropriate assessment levels or compliance limits for the operator to comply with in future.

We consider this condition necessary as although the volume of each individual emission is comparatively small, the quality of combustion employed in each case can significantly alter the levels of various pollutants ultimately present within the emission. By requiring ongoing emissions monitoring, this condition will ensure that the operator achieves, and then continues to operate their processes and equipment to an acceptable standard, and commensurately reduces their environmental impact to as low a level as is reasonably practical.

7) Vapour Recovery Plan – Improvement condition IC7

Improvement condition IC4 is necessary as the operator does not appear to be currently complying with the requirement to capture and recover all hydrocarbon vapours arising from the loading and unloading of liquid hydrocarbons into vehicles.

Vapour recovery is necessary both for safety reasons and also to reduce the environmental impacts of storing, loading, transporting and unloading hydrocarbons.

Improvement condition IC8 is required because the operator has indicated that rainwater is not always being dealt with in accordance with requirements necessary to protect the environment from uncontrolled contaminated discharges of site surface water. The development of a plan to show how rainfall is managed to ensure the environment is not compromised, will clarify how the requirements are being met and how the environment is being protected.

8) Surface Water Management Plan – Improvement condition IC8

Improvement condition IC5 is required because the operator has indicated that rainwater is not always being dealt with in accordance with requirements necessary to protect the environment from uncontrolled contaminated discharges of site surface water. The development of a plan to show how rainfall is managed to ensure the environment is not compromised, will clarify how the requirements are being met and how the environment is being protected.

Decision checklist

Aspect considered	Decision
Receipt of application	
Confidential information	A claim for commercial or industrial confidentiality has not been made.
Identifying confidential information	We have not identified information provided as part of the application that we consider to be confidential.
Consultation	
Consultation	<p>The consultation requirements were identified in accordance with the Environmental Permitting Regulations and our public participation statement.</p> <p>The application was publicised on the GOV.UK website because of the high levels of public interest in the onshore Oil and Gas Sector. The application itself is NOT high public interest.</p> <p>We consulted the following organisations: Local Authority, Environmental Protection- North Lincolnshire Council Food Standards Agency Health and Safety Executive Mineral Planning Authority-North Lincolnshire Council</p>
Operator	
Control of the facility	We are satisfied that the applicant (now the operator) is the person who will have control over the operation of the facility after the grant of the permit. The decision was taken in accordance with our guidance on legal operator for environmental permits.
The facility	
The regulated facility	<p>We considered the extent and nature of the facility at the site in accordance with RGN2 'Understanding the meaning of regulated facility', Appendix 2 of RGN 2 'Defining the scope of the installation', Appendix 1 of RGN 2 'Interpretation of Schedule 1', guidance on waste recovery plans and permits.</p> <p>The extent of the facility defined in the site plan and in the permit. The activities are defined in table S1.1 of the permit.</p>
The site	
Extent of the site of the facility	The operator has provided plans which we consider are satisfactory, showing the extent of the site of the facility including emission and discharge points. The plans are included in the permit.
Site condition report	<p>The operator has provided a description of the condition of the site. We have assessed the site condition report and concluded that it will need updating in order to comply with requirements of Article 22 of the Industrial Emissions Directive. We have therefore imposed an improvement condition IC9 requiring the operator to review and update their site condition report include at least the following:</p> <ul style="list-style-type: none"> i) consideration of oil storage areas including oil storage vessels, bunds, loading and unloading areas and other potential sources of contamination as shown in the site location plan. ii) reference to any historical spillages, the chemicals involved and locations baseline soil sample results and groundwater data. . We have included an improvement condition (IC9) in the permit to review the site condition report to ensure Article 22 of the Industrial Emissions Directive is complied with. <p>The decision was taken in accordance with our guidance on site condition reports and baseline reporting under the Industrial Emissions Directive.</p>
Waste management plan	The operator has provided a waste management plan which we consider is satisfactory.

Aspect considered	Decision
Biodiversity, heritage, landscape and nature conservation	<p>We consider that the application will not affect any sites of nature conservation, landscape and heritage, and/or protected species or habitats identified.</p> <p>We have not consulted Natural England on the application. The decision was taken in accordance with our guidance.</p> <p>Risby Warren SSSI is located 620 metres to the North East of the site. There is farming land separating the permitted site from the SSSI.</p> <p>We have considered the location of the site, the activities taking place and the materials likely to be present within the extractive waste in order to set suitable conditions and limits in the permit.</p> <p>Given that none of the proposed activities will be carried in or near the SSSI, the proposed activities are unlikely to damage the features of special interest for the SSSI.</p> <p>Due to the distance from the site's operations and the pollution prevention measures that we are imposing through conditions of this permit, we consider that the management of the solid and liquid wastes and any gas emissions will not affect the protected species and habitats and will not damage the special features of the SSSI.</p>
Environmental risk assessment	
Environmental risk	<p>We have reviewed the operator's assessment of the environmental risk from the facility.</p> <p>The operator's risk assessment is satisfactory.</p> <p>There will be no increase in emissions as a result of this variation, and consequently no increase in environmental risk.</p>
Operating techniques	
Operating techniques Water Quality	<p>We have reviewed the Operator's Hydrological risk Assessment and the operating techniques proposed by the operator and compared these with the relevant technical guidance and we consider them to represent appropriate techniques for the facility. We are satisfied that the risks to groundwater have adequately been assessed and the proposed activities are not likely to have an adverse impact on the hydrological features in this area.</p> <p>To the extent that it might lead to a discharge of pollutants to groundwater (a "groundwater activity" under the EPR 2016), the Permit is subject to the requirements of Schedule 22, which delivers the requirements of EU Directives relating to pollution of groundwater. The Permit will require the taking of all necessary measures to prevent the input of any hazardous substances to groundwater, and to limit the input of non-hazardous pollutants into groundwater so as to ensure such pollutants do not cause pollution, and satisfy the requirements of paragraph 6 of Schedule 22 and Article 6(1) Groundwater Daughter Directive. The operating techniques that the applicant must use are specified in table S1.2 in the environmental permit. In addition we have imposed condition 3.5.1 which requires the operator to monitor groundwater quality.</p> <p>IC5 requires the operator review their surface water management and implement any agreed changes.</p>

Aspect considered	Decision
General operating techniques	<p>We have reviewed the techniques used by the operator and compared these with the relevant guidance notes and we consider them to represent appropriate techniques for the facility. The operating techniques that the applicant must use are specified in table S1.2 in the environmental permit. This includes the requirement for the Operator to provide a waste management plan and the information required within this. The waste management plan, including associated documents, has been assessed in accordance with these requirements and is approved subject to conditions. Condition 2.3.1 ensures that the operations are limited to those described in the WMP and in table S1.2. It also ensures that the Operator follows the techniques set out and that any deviation will require our written approval. Any significant changes will require a formal variation of the permit. Where a condition imposes a specific requirement that will take precedence over anything in the plan.</p> <p>In addition have inserted additional improvement conditions as part of the permit review to ensure these operations continue to meet the requirements of our Onshore Oil and Gas Sector Guidance, August 2016.</p>
Odour Management	<p>We have considered potential odour emissions from the activity during our determination. We do not consider that the activity will give rise to significant levels of odour. Condition 3.3.1 in the permit requires that emissions from the activities shall be free from odour at levels likely to cause pollution outside the site.</p> <p>We are satisfied that appropriate measures will be in place to manage odour. However, we have included condition 3.3.2 in the permit. This condition enables us to require the Operator to submit a specific odour management plan, should odour become a problem. If a plan be required in the future, once we have assessed this plan as suitable, it will form part of the permit and the Operator must carry out the activity in accordance with the approved techniques.</p>
Noise management	<p>We have considered emissions from noise and vibration during our determination. Condition 3.4 in the permit requires that emissions from the activities shall be free of noise and vibration at levels likely to cause pollution outside the site.</p> <p>We have included condition 3.4.2 in the permit. This condition enables us to require the Operator to submit a specific noise and vibration management plan, should noise and vibration become a problem. If a plan be required in the future, once we have assessed this plan as suitable, it will form part of the permit and the Operator must carry out the activity in accordance with the approved techniques.</p>
Permit conditions	
Use of conditions other than those from the template	Based on the information in the application, we consider that we do not need to impose conditions other than those in our permit template.
Updating permit conditions during consolidation	We have updated permit conditions to those in the current generic permit template as part of permit consolidation. We have also updated permit conditions to make reference to the most modern legislation. The conditions will provide the same level of protection as those in the previous permit(s).
Changes to the permit conditions due to an Environment Agency initiated variation	<p>We have varied the permit as stated in the variation notice.</p> <p>This variation is required as the Environment Agency has a duty, under the Environmental Permitting (England and Wales) Regulations 2016, regulation 34(1), to periodically review permits. As a result of that review we have identified a number of necessary changes we must make to your permit to reflect current legislation and best practice. These changes principally relate to the improvement programme specified in condition 2.4 of the permit</p>
Improvement programme	<p>Based on the information on the application, we consider that we need to impose an improvement programme.</p> <p>We have imposed an improvement programme for reasons outline in “key issues” above.</p>

Aspect considered	Decision
Emission limits	<p>We have considered emissions to air during the determination of the application. Fugitive emissions associated with the proposed activities will be at insignificant levels which are unlikely to cause negative impact on nearby receptors.</p> <p>The Operator has provided environmental risk assessments and consideration in the WMP for the management of waste gas and we have found these to be satisfactory. Acidification and Toxic Contamination could occur from the potential release of SO₂ and NO_x into the atmosphere during venting.</p> <p>ELVs equivalent parameters have been set for the Hydrogen sulphide in Schedule 3 of the permit. Hydrogen Sulphide We have also required the operator to monitor emissions to air, and if trends shown an increase in emissions, then the Environment Agency will require the operator to implement a plan to</p>
Monitoring	<p>We have decided that monitoring should be carried out for the parameters listed in the permit, using the methods detailed and to the frequencies specified. Condition 3.5 of the permit requires the Operator to monitor emissions to air from the oil gas vent and changes in groundwater quality attributable to reinjection of produced water. The Operator will keep records of the data collected, which must be submitted to the Environment Agency on a regular basis.</p> <p>We made these decisions in accordance with the requirements of our Onshore Oil and Gas Sector Guidance, August 2016 and the Groundwater Directive and to baseline report required under the Industrial Emissions Directive. Based on the information in the application we are satisfied that the operator's techniques, personnel and equipment have either MCERTS certification or MCERTS accreditation as appropriate.</p>
Reporting	<p>We have specified reporting in the permit.</p> <p>The reports will enable information on trends to be assessed and interventions to be carried out when required.</p> <p>We made these decisions in accordance with the requirements of our Onshore Oil and Gas Sector Guidance, August 2016 and the Groundwater Directive and to baseline report required under the Industrial Emissions Directive.</p>
Operator competence	
Management system	<p>There is no known reason to consider that the operator will not have the management system to enable it to comply with the permit conditions.</p> <p>The decision was taken in accordance with the guidance on operator competence and how to develop a management system for environmental permits.</p>
Relevant convictions	<p>The Case Management System and National Enforcement Database have been checked to ensure that all relevant convictions have been declared.</p> <p>No relevant convictions were found. The operator satisfies the criteria in our guidance on operator competence.</p>
Financial competence	<p>There is no known reason to consider that the operator will not be financially able to comply with the permit conditions.</p>
Financial provision	<p>We are satisfied that the waste from the site has properly been characterised as non-hazardous waste. By virtue of paragraph 9(3) of Schedule 20 to the Environmental Permitting (England and Wales) Regulations 2016 the requirements mentioned in Article 2(3) of the MWD are waived. These requirements include the need for a financial guarantee for non-hazardous waste, unless deposited in a Category A facility. So no financial guarantee can be required in respect of the fluid left in the target formation.</p>

Aspect considered	Decision
Growth Duty	
Section 108 Deregulation Act 2015 – Growth duty	<p>We have considered our duty to have regard to the desirability of promoting economic growth set out in section 108(1) of the Deregulation Act 2015 and the guidance issued under section 110 of that Act in deciding whether to grant this permit.</p> <p>Paragraph 1.3 of the guidance says:</p> <p>“The primary role of regulators, in delivering regulation, is to achieve the regulatory outcomes for which they are responsible. For a number of regulators, these regulatory outcomes include an explicit reference to development or growth. The growth duty establishes economic growth as a factor that all specified regulators should have regard to, alongside the delivery of the protections set out in the relevant legislation.”</p> <p>We have addressed the legislative requirements and environmental standards to be set for this operation in the body of the decision document above. The guidance is clear at paragraph 1.5 that the growth duty does not legitimise non-compliance and its purpose is not to achieve or pursue economic growth at the expense of necessary protections.</p> <p>We consider the requirements and standards we have set in this permit are reasonable and necessary to avoid a risk of an unacceptable level of pollution. This also promotes growth amongst legitimate operators because the standards applied to the operator are consistent across businesses in this sector and have been set to achieve the required legislative standards.</p>

Further Legislation	
Schedule 22 to the EPR 2016 – Water Framework and Groundwater Daughter Directives	To the extent that it might lead to a discharge of pollutants to groundwater (a “groundwater activity” under the EPR 2016), the Permit is subject to the requirements of Schedule 22, which delivers the requirements of EU Directives relating to pollution of groundwater. The Permit will require the taking of all necessary measures to prevent the input of any hazardous substances to groundwater, and to limit the input of non- hazardous pollutants into groundwater so as to ensure such pollutants do not cause pollution, and satisfy the requirements of paragraph 6 of Schedule 22 and Article 6(1) Groundwater Daughter Directive.
Water Environment (Water Framework Directive) (England and Wales) Regulations 2003	Consideration has been given to whether any additional requirements should be imposed in terms of the Environment Agency’s duty under regulation 3 to secure compliance with the requirements of the Water Framework Directive through (inter alia) environmental permits, but we consider that existing conditions are sufficient in this regard, and no other appropriate requirements have been identified.

Consultation

The application was publicised on the GOV.UK website because of the high levels of public interest in the onshore Oil and Gas Sector. The application itself is NOT high public interest.

We consulted the following organisations:

- Local Authority, Environmental Protection- North Lincolnshire Council
- Food Standards Agency
- Health and Safety Executive
- Mineral Planning Authority-North Lincolnshire Council

No objections were received from the all the Statutory consultees whom we consulted nor members of the public.