

Permitting decisions

Variation to permit

We have decided to issue the variation for Farley's Wood well site operated by Onshore Oilfield Services Limited.

The variation number is EPR/EP3934UH/V002

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 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,
- Oil storage activities, and
- A standalone water discharge activity (WDA)

The variation also aim 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 the process

The installation comprises of oil production activities at a single site known as Farley's Wood well site, located 3.5 km west of Tuxford, between the villages of Milton and Walesby in Nottinghamshire. The site is approximately 0.79 hectares in area and comprises two actively producing oil extraction wells (FW5 and FW6) and two produced fluid storage tanks. Oil extracted from the reservoir (Longshaw Grit and Crawshaw Sandstone formations) is pumped directly to the bunded oil storage tanks. The oil is 'dry' as no admixed water is produced. The storage tanks are periodically emptied by road tanker, with the production fluid (oil) transferred by road tanker for treatment at South Killingholme. The oil storage tanks each have a vent stack which allow gas entrained within the production fluids to escape to atmosphere. The site's total storage capacity is 754 bbls (barrels) or 260 tonnes or 120 cubic metres (m³).

The oil extraction wells operate on a variable timer system, with short periods of production interspersed with off periods to allow for well recharge. Current oil production from the site is 14 bbls or 2.2 m³ per day, which is exported via road tanker once a suitable volume (between 28 to 30 m³) is available within the storage tanks.

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 via hot water washing; this involves circulating heated fluids around the well pumping system to dissolve the deposits. This activity can be considered a preventive maintenance measure, if not carried out the result would lead to a complete pumping system failure. The rectification of the failure is high cost and a greater operational and environmental risk.

The principal releases into the environment from the site 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 from hard surfaced, non-process well-site areas discharges to an unnamed tributary of River Maun via site drains. This activity was previously regulated via a separate environmental permit for a water discharge activity (WDA) via permit reference T/70/10992/T (issued 11/02/1988), which is now superseded by this varied permit.
- (d) Contaminated rainwater from well cellars and containment systems/bunds is removed by tanker for off-side treatment.
- (e) Engineering waste resulting from maintenance work is removed for disposal at a licensed waste disposal facility.

There is one site of special scientific interest (SSSI) within 2.0 km of this installation; Bevercoates Park SSSI is located 810 metres to the south-west of the site. There is one European designated habitats site, a Special Area of Conservation (SAC) within 10.0 km of the site; Birklands and Bilhaugh SAC is located 6.58 km to the south-west of the site.

Description of the changes introduced by the variation

This is a normal variation to add or change the following activities.

- 1) Installation Activities, Oil storage and handling has been changed to a schedule 1.2 A (1) (e) (i) activity under the Industrial Emissions Directive and updated Environmental Permitting (England and Wales) Regulations 2016, as a result of renumbering of schedule 1 activities in the updated regulations. This activity was previously permitted as 1.2A (1) (h) (i) in the existing permit. The existing oil storage activities on site have not changed from those currently permitted.
- 2) 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 hot water wash and well work-over operations. These are not new activities, and were previously covered by the operators operating techniques in their existing permit.
- 3) A Water Discharge Activity (WDA), as defined by Schedule 21 of the Environmental Permitting (England and Wales) Regulations 2016, as amended, for the discharge of site drainage from non-process areas to an unnamed tributary of the River Maun.

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.

Key issues of the decision

Background

This variation is part of a sector wide permit review of onshore oil and gas sites. The variation to the permit is for continued operation of an existing conventional oil and gas production site. This variation does not permit any hydraulic fracturing as specified in Schedule 1 of the permit under Table S1.1, activity A2.

The operator previously held an installation permit as an onshore oil and gas production facility, unloading, handling or storage of crude oil, or treatment under the Pollution Prevention and Control (England and Wales) Regulations 2000.

During 2008, these permits automatically became environmental permits under the environmental permitting regime. This regime was expanded in 2010 and is now covered by the Environmental Permitting (England and Wales) Regulations 2016 (the 2016 Regulations).

Since 1 October 2013 we have taken the view that operators of new onshore oil and/or gas exploration or appraisal facilities require environmental permits where activities include:

- the management of extractive waste, whether or not this involves a waste facility (as a mining waste operation)
- flaring of waste gas using a flare which has the capacity to incinerate over 10 tonnes a day (as an installation)
- a water discharge activity
- a groundwater activity, such as an indirect discharge of pollutants as part of high pressure high volume hydraulic fracturing
- waste being managed that meets the thresholds for radioactivity set out in the 2016 Regulations (as a radioactive substances activity)

We now consider that the same environmental permits are required for existing onshore oil and/or gas facilities, in addition to the permit required for crude oil unloading, handling or storage, or treatment. This permit variation and consolidation brings these permits in line with the new regulations and approach for permits issued since 2013.

Installation Activities

The Installations activities (oil storage, treatment and handling), have not changed at this site. The activity reference has been amended to align with the legislative change as a result of the updated Environmental Permitting (England and Wales) Regulations 2016. Limits on activities have been specified in this permit to align with our current permit wording under the standard rules permit (SR2015 No.2) for oil storage.

Mining Waste Activities

A permit subject to the Mining Waste Directive covers the management of extractive waste generated during oil and gas production. This variation does not permit any hydraulic fracturing. We have specified this limit in Schedule 1 of the permit under Table S1.1, Activity A2.

The operator may also undertake near wellbore treatments during the lifetime of hydrocarbon production from the wells, as part of routine maintenance activities, which includes hot water washing. The purpose of hot water washing is to remove the build-up of paraffin precipitates. The process involves circulating heated water down the well, to the production tubing above the perforations and is circulated back to the surface to the storage tanks. The hot water wash does not have any contact with the reservoir formation and does not pose a risk to groundwater.

We have imposed an improvement programme for has management at the site in line with the sector guidance under improvement conditions (ICs) 2, 4, and 6. We are satisfied that these measures to minimise risk of air emissions together with condition 3.1.1 provide acceptable controls.

If the operator wishes to carry out different or additional activities not covered by this permit, a further permit 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 on the waste management plan (WMP) and limit the activities to those stated (unless otherwise agreed in writing by the Environment Agency). We will authorise only minor amendments to the WMP without the need to vary the permit.

Water Discharge Activities (WDA)

The point source water discharge activity (for a discharge of trade effluent, composed of site drainage being discharged to surface watercourse) has not changed at this site. The discharge is composed of site based rainfall run off from non-process areas to an unnamed ditch tributary of the River Maun (via outlet W1).

This existing water discharge activity has been incorporated and consolidated into the permit as part of this variation. The site's previous permit (reference T/70/10992/T, issued on 11/02/1988 and held by the operator since 10/06/2002) for this water discharge activity has now been superseded.

Interim discharge parameter limits for chloride, pH, sodium and Total Petroleum Hydrocarbons are included in table S3.2 of the permit to prevent any potential impact on underlying groundwater in the principal aquifer, as the watercourse is intermittently dry.

We have included an Improvement Condition which requires the operator to review their site surface water management and submit a Surface Water Management Plan to show how rainfall is managed to ensure the environment is being protected. As part of this Improvement Condition the operator will review the interim discharge parameter limits in the permit to clarify how the environment is being protected. The operator shall monitor the quality of the surface water discharge for a suite of a parameters that could be present in the discharges for a duration and frequency approved in writing by the Environment Agency. The operator will use the data collected to carry out a numerical risk assessment and derive site specific quality limits for the discharges that are protective of the groundwater environment and outline how these will be implemented in the Surface Water Management Plan.

This 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.

Gap Analysis

We have assessed the Operator's gap analysis response which was received on 29/06/2017. We have included a number of improvement conditions (ICs) in response to this.

Schedule 5 responses

We requested additional information to be provided under a schedule 5 notice issued on 05/03/2018. We are satisfied that the notice has been complied and additional information provided in order that the permit can be determined. Any outstanding issues have been included as part of our improvement programme under table S1.3 under the permit.

Improvement Programme

The site had historic improvement conditions (ICs) 1 to 4 within the original site permit EPR/EP3934UH (issued 09/09/2009). All of these historic ICs have previously been completed (IC1, IC3 and IC4 from this permit), or are removed and will be addressed by this permit variation (IC2). Based on the outcomes of the onshore oil and gas re-permitting variation determination and gap analysis response for the site, we have imposed the following new improvement conditions within the varied permit (ICs 1 to 8):

We have imposed the following new improvement conditions (ICs) within the permit:

Improvement condition IC1: Secondary and tertiary containment

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.

Improvement condition IC2: Leak detection and repair

Improvement condition IC2 is required for a leak detection and repair plan, which is needed to manage fugitive VOC emissions from potential leak points such as seals, 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.

Improvement condition IC3: Updated written Environment Management System

Improvement condition IC3 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 the usual compliance audits in the future.

Improvement condition IC4: Updated written Gas Management System

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 IC 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 the usual compliance audits in the future.

Improvement condition IC5: Air emissions monitoring

Improvement condition IC5 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 points 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 IC4, 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.

By requiring on-going 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.

Improvement condition IC6: Vapour recovery

Improvement condition IC6 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 IC7: Surface water management plan

Improvement condition IC7 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, and will clarify how the requirements are being met and how the environment is being protected.

Improvement condition IC8: Site condition report

Improvement condition IC8 is necessary as a review of the site condition report by the operator is required to ensure that Article 22 of the Industrial Emissions Directive (IED) is complied with. A site condition report is required where there is a possibility of soil and groundwater contamination from activities that involve the use, production or release of a relevant hazardous substance, as defined in the IED.

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:</p> <ul style="list-style-type: none"> • Local Authority, Environmental Health/Protection (Nottinghamshire County Council) • Food Standards Agency • Health and Safety Executive • Public Health England • Local Mineral Planning Authority (Nottinghamshire County Council) <p>The comments and our responses are summarised in the consultation section.</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 is 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 a plan which we consider is satisfactory, showing the extent of the site of the facility including the discharge points. The plan is included in the permit.

Aspect considered	Decision
Site condition report	<p>The operator has provided a description of the condition of the site.</p> <p>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 requiring the operator to review and update their site condition report to 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 historic spillages, the chemicals involved and locations baseline soil sample results and groundwater data. We have included an improvement condition (IC8) in the permit to review the site condition report to ensure Article 22 of the Industrial Emission Directive is complied with. <p>The decision was taken in accordance with our guidance on site condition reports and baseline reporting under the Industrial Emission Directive.</p>
Waste management plan	<p>The operator has provided a waste management plan which we consider is satisfactory.</p>
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>We have considered the emissions to air from the existing site, which has been permitted since 28/08/2009. There are no increases in air emissions as a result of this variation and consolidation. The emissions to air are from the oil storage tanks only on site. The Bevercoates Park special site of scientific interest (SSSI) is located 800 metres to the south-west of the site, and Birklands and Bilhaugh special area of conservation (SAC) is located 6.58 km to the south-west of the site.</p> <p>No impact on the SSSI has been noted as a result of air quality impacts. The SSSI is formed on a single unit which is currently in 100% unfavourable recovering condition; this condition is based on historic management of the site, as there are a lack of mature and over mature trees. The H1 submitted with the application screens out all air emissions as insignificant. In addition, this varied and consolidated permit will include pollution prevention measures in the form of monitoring and reporting limits on the point source emission points to air to minimise any impact. Additionally, a review of gas management has been specified within the permit via improvement condition IC4 to further reduce any future air impacts if required.</p> <p>Due to the distance between the SSSI and the existing site's operations and the pollution prevention measures that we are imposing through conditions within the varied permit, we consider that the existing activities are NOT likely to damage the features of the SSSI. Therefore, an Appendix 4 Countryside and Rights of Way Act (CRoW) 2000 assessment form has been completed for information and filed for audit on EDRM due to the proximity of the SSSI.</p> <p>A HRA Stage 1 proforma for information was not deemed necessary due to the distance between the permitted site and the designated Birklands and Bilhaugh SAC site as there is no pathway for an impact to occur. Therefore, there is no likely significant effect as a result of the existing activities.</p>

Aspect considered	Decision
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	
<p>Operating techniques</p> <p>Water Quality</p>	<p>We have reviewed the techniques proposed by the operator and compared these with the relevant technical guidance and we consider them to represent appropriate techniques for the facility.</p> <p>The operating techniques that the applicant must use are specified in table S1.2 in the environmental permit.</p> <p>IC1 requires the operator to review their site containment in order to demonstrate there is no pollution risk to surface and groundwater.</p> <p>IC7 requires the operator to review their surface water management and implement any agreed changes.</p>
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.</p> <p>The operating techniques that the operator 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.</p> <p>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 we have specified 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>
Operating techniques for emissions that do not screen out as insignificant	<p>Air emissions of Methane, Ethane, Propane and Butane have been screened out as insignificant in the operators H1 assessment (provided with the variation application). To ensure that gas management on site is BAT in accordance with our sector guidance we have included IC2, IC4, IC5 and IC6 to review leak detection, gas management and emissions and vapour recovery during unloading in order to agree that the operator's proposed techniques are BAT for the installation.</p> <p>We consider that the emission limits included in the installation permit along with the ICs above reflect the BAT for sector.</p>

Aspect considered	Decision
Odour management	<p>We have considered potential odour emissions from the activity during our determination. We do not consider that the activities 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 is suitable, it will form part of the permit and the Operator must carry out the activities in accordance with the approved techniques.</p>
Noise management	<p>We have considered emissions from noise and vibration during our determination. Condition 3.4.1 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 is 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 activities 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. 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 the reasons outlined in the 'key issues' section 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.</p> <p>ELVs equivalent parameters have been set for the following substances in Schedule 3 of the permit:</p> <p>For activity A2 (via emissions points A1 and A2)</p> <ul style="list-style-type: none"> • Gas vented (calculation method) • Hydrogen Sulphide (H₂S) <p>For activity A4, it is considered that the numeric limits described below will prevent significant deterioration of the receiving waters. We have imposed these limits because either a relevant environmental quality or operational standard requires this.</p> <p>Discharge limits for the discharge of site surface water to an unnamed tributary of the River Maun (activity A4 via outlet W1) have been set for the following parameters in Schedule 3, Table S3.2 of the permit:</p> <ul style="list-style-type: none"> • Chloride – 150 milligrams per litre (mg/l) (maximum) • Sodium – 200 mg/l (maximum) • pH – 6.0 (minimum) to 9.0 (maximum) • Total Petroleum Hydrocarbons – 2.0 mg/l (maximum) <p>The Total Petroleum Hydrocarbon limit has been derived based on the treatment specification of the oil interceptor within the application documents.</p> <p>The limit for sodium has been set at the Drinking Water Standard (DWS) which is the relevant environmental quality standard to protect the water quality in the principal aquifer and chloride has been set below the Drinking Water Standard. These discharge limits have been set to prevent the input of these pollutants into groundwater and prevent the deterioration of underlying groundwater (as the receiving watercourse is intermittently dry). The pH range is typical of the pH range for surface water and groundwater.</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.</p> <p>Condition 3.5 of the permit requires the Operator to monitor emissions from the site (i.e. emissions to air from the storage tank vents, and emissions to surface watercourse).</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 the baseline report required under the Industrial Emissions Directive.</p> <p>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, as required under 3.5.3 of the permit.</p>

Aspect considered	Decision
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 and that there is no mining waste facility for extractive 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 fluid left in the target formation.</p>
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</p>

Aspect considered	Decision
	<p>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	
<p>Water Environment (Water Framework Directive)(England and Wales) Regulations 2003</p>	<p>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.</p>

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/Health (Nottinghamshire County Council)
- Food Standards Agency
- Health and Safety Executive
- Public Health England
- Local Mineral Planning Authority (Nottinghamshire County Council)

No objections were received in the responses (provided below) from the statutory consultees whom we consulted. No objections were received in response to our GOV.UK publication of the permit variation application from members of the public.

Responses from organisations listed in the consultation section

Response received from
Public Health England
Brief summary of issues raised
<p>Thank you for forwarding a copy of this application for a variation to an existing environmental permit to the Centre for Radiation, Chemical and Environmental Hazards (CRCE) at Public Health England on 7th August 2017. The application states that the proposed variation relates to the Environment Agency's re-permitting exercise to include well maintenance activities.</p> <p>The site has been a producing oilfield since the mid-1980s, and the application states that are no plans to undertake additional drilling at the site. The main emissions of potential concern are fugitive emissions of hydrocarbons to ground or water, and fugitive emissions to air of volatile organic compounds associated with the loading, unloading, handling and storage of crude oil. The application indicates that the process will not give rise to significant releases and that mitigation measures are in place.</p> <p>Based on the information contained in the application supplied to us, Public Health England has no significant concerns regarding the risk to the health of the local population from the installation.</p> <p>This consultation response is based on the assumption that the permit holder shall take all appropriate measures to prevent or control pollution, in accordance with the relevant sector guidance and industry best practice.</p>
Summary of actions taken or show how this has been covered
N/A

Response received from
Nottinghamshire County Council
Brief summary of issues raised
The Planning Policy and Development Management Team area not aware of any noise or other amenity issues at this site and have not taken any enforcement action.
Summary of actions taken or show how this has been covered
N/A

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