

# Permitting decisions

## Variation to permit

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We have decided to issue the variation for Kimmeridge wellsite operated by Perenco UK Limited.

The variation number is EPR/ZP3230CE/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

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 a hydrogeological 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.

This permit relates to the Kimmeridge Wellsite which forms part of the Perenco UK Limited's Wytch Farm operation based on the Isle of Purbeck in Dorset. Kimmeridge Wellsite is located on top of the coastal cliffs surrounding Kimmeridge Bay, approximately 9km from the main Wytch Farm operations, which are the subject of a separate permit. The Application was duly made on 11th July 2017.

We gave the Application the reference number EPR/ZP3230CE/V002. We refer to the Application as "the Application" in this document in order to be consistent.

The number we have given to the permit is EPR/ZP3230CE. We refer to the permit as "the Permit" in this document.

## 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.

## Radioactive Substances

This has been assessed as part of pre-application discussions for this application. A separate radioactive substances permit is not required at this site as any production fluids (crude oil and produced water) are sent to the Main Wytch Farm facility for separation and further processing.

## Brief outline of the process

This permit relates to the Kimmeridge Wellsite which forms part of the Perenco UK Limited's Wytch Farm operation based on the Isle of Purbeck in Dorset.

Kimmeridge Wellsite is located on top of the coastal cliffs surrounding Kimmeridge Bay, approximately 9km from the main Wytch Farm operations, which are the subject of a separate permit.

The Kimmeridge oilfield was discovered in 1959 in the Cornbrash limestone close to the village of Kimmeridge. The Cornbrash limestone is located at a depth of approximately 600 m and is accessed via a single oil production well (KA-01) on the Kimmeridge Wellsite. The current oil production rate is approximately 70 barrels per day. Gas production from the well is less than 2 tonnes per day.

Oil is pumped to the surface using a beam pump. At the surface the fluid is pumped through an above ground pipeline to two above ground 56 tonne storage tanks, with a total site capacity of 112 tonnes. Gas produced with the oil comes out of solution in the storage tanks. As Kimmeridge Wellsite is not connected by pipeline to the main Gathering Station like the other wellsite, the gas is vented to atmosphere through two elevated vents at a height of approximately 5 metres above ground level and the crude is transported by road tanker to the Gathering Station.

Kimmeridge Wellsite is designed to be operated to minimise the risk of environmental impact through containment of all process equipment in concrete surfaced and bunded areas and collection of any rainwater runoff from these areas. All the Wytch Farm wellsites, including Kimmeridge are designed to be unmanned and are monitored and controlled from a central control room at the main Wytch Farm Gathering Station. The control system and emergency shutdown system are designed to ensure that the sites can be controlled and shutdown safely. In addition to this all sites are visited by an operations technician at least once during a 12 hour shift. This is to monitor and record process parameters and to ensure that the wells and wellsite is operating correctly.

At Kimmeridge wellsite the only emission to air is the cold vented gas from the oil storage tanks. No abatement is present. The total quantity of gas emitted is calculated based on the amount of oil production. All rainwater from the bunded area is brought back to the Gathering Station by tanker for reinjection into the Wytch Farm oilfield reservoirs.

The principal releases to the environment comprise:

- a) Emissions to air of hydrocarbon gases from separation of volatiles in storage
- b) Emissions to air of hydrocarbon gases from the road tanker by displacement on loading
- c) Any waste resulting from maintenance is transported back to Wytch Farm Gathering Station for disposal.

The coastal cliffs adjacent to the wellsite form part of the Dorset and East Devon Coast World Heritage Site, South Dorset Coast Site of Special Scientific Interest (SSSI) and the Isle of Portland to Studland Cliffs Special Areas of Conservation (SAC). The South West Coast Path runs along the top of the cliffs immediately past the wellsite; there are other public footpaths within 400m to the east of the wellsite. The Purbeck Marine Wildlife Reserve (covering 3,500ha within Kimmeridge Bay) is the longest established Voluntary Marine Nature Reserve in the UK.

## 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 in the updated regulations (previously 1.2A(1)(h)(i) in the existing permit). The oil storage and handling 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. This extractive wastes generated from well workovers, well maintenance treatments, venting of waste gas from routine production and well abandonment activities as detailed in the operator's waste management plan. The activities on site have not changed from those currently permitted, but the Mining Waste Directive applies to extractive wastes.

There are no groundwater activities associated with this permit. There are no reinjection wells on site and all well maintenance treatments (hot oil wash and acid wash) listed in the waste management plan are de minimis from a groundwater perspective.

## 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 A3.

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 Installation activities (oil storage, treatment and handling) have not changed at the 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. The amount of oil stored on site is below 500 tonnes (112 tonnes in total) and therefore the activity falls into table 2.8.8 of our 2018 charging scheme.

### **Gas management**

We have included a standard IC to review gas management at the site. The site currently cold vents from the storage tanks. The permit previously contained an improvement condition for the operator to review gas management at the site, but to date the plans submitted have not identified a economically feasible option. We have included ICs 4 and 6 to get the operator to produce a gas management plan and vapour recovery plan for the site in line with other sites in the sector. We have set the timescale for submission of the gas management plan under IC4 to align with the first set of gas management plans to be submitted by other oil and gas sites as part of this repermitting review to ensure that this issue is prioritised at this site and we are being consistent in our BAT assessment across the sector.

We have checked with the Oil and Gas Authority (OGA) regarding their separate vent consent of 1.912 tonnes/day which was agreed for 2019/2020. They are aware of the improvement requirements specified in this permit under IC4.

### **Mining Waste Activities**

This permit is subject to the Mining Waste Directive and 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 A3. It also does not include any future drilling of sidetracks or new wells, but does include any future abandonment or decommissioning of wells.

The operator may also undertake workovers and near wellbore treatments during the lifetime of hydrocarbon production from the well, as part of routine maintenance activities. These will include hot oil washing and acid treatment. The purpose of hot oil washing is to remove the build-up of paraffin precipitates. The process involves circulating heated oil down the well, to the production tubing above the perforations and is circulated back to the surface. Paraffin precipitates dissolved in the hot oil at the surface are passed through a free phase separator and directed to on-site storage tanks. The hot oil wash does not have any significant contact with the reservoir formation and does not pose a risk to groundwater.

The purpose of the acid wash is to remove produced water scales from production tubing which have been blocked during the production of hydrocarbons. 25-37% Hydrochloric acid solution 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 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.

The mining waste activities include the cold venting of gas from the oil storage tanks. We have imposed an improvement programme for gas management at the site in line with the sector guidance under ICs 2, 4, 5 and 6. We are satisfied that these measures to minimise the risk of air emissions, together with condition 3.1.1 provide acceptable controls.

### **Groundwater Activities**

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.

We have assessed the application and reviewed the existing permit and concluded that no groundwater activities are taking place on the site, and therefore a groundwater permit is not required

We are satisfied that all the well treatments proposed (hot oil and acid wash) meet the de-minimis assessment and there are no groundwater activities taking place.

As there are no groundwater activities, we have not required groundwater monitoring to be installed at this site. We have required the site condition report to be reviewed under IC7 . This will ensure the site continues to present no risk to soil or groundwater.

### **Surface Water Activities**

Surface water comment. We have checked the site drainage infrastructure on site as part of this application and confirmed there are no discharges of surface water to ground or surface waters from the site which require permitting. All runoff is clean rainfall runoff from non-process areas of the site. Any contaminated site surface water from the storage bund is collected and sent to Wytch Farm for treatment prior to reinjection.

### **Gap Analysis**

We have assessed the Operators gap analysis response which was received on 18/08/2017. We have included a number of additional Improvement conditions in response to this. In particular we have specified some improvements to the operator's management system under IC3 to review:

- i) The procedure for identifying bund fill levels, e.g. high level alarm on unmanned sites
- ii) The procedures for testing the impermeable membrane and subsequent remediation measures if required.

Other issues identified in the gap analysis have been address by the gas management improvement conditions ICs 4-6.

## **Schedule 5 responses**

We requested additional information to be provided by 30/11/2017 under a schedule 5 notice issued on 11/10/2017. 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 conditions**

We have included a standard suite of improvement conditions (ICs1 to 7 inclusive) to bring the site in line with the rest of the oil and gas sector as part of our Re-Permitting review described above. The reasoning behind these generic conditions is explained in more detail below in our decision checklist.

## Decision checklist

Aspect considered	Decision
<b>Receipt of application</b>	
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.
<b>Consultation</b>	
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"> <li>• Local Authority, Environmental Protection</li> <li>• Food Standards Agency</li> <li>• Health and Safety Executive</li> <li>• Mineral Planning Authority</li> </ul> <p>The comments and our responses are summarised in the <a href="#">consultation section</a>.</p>
<b>Operator</b>	
Control of the facility	<p>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.</p> <p>The decision was taken in accordance with our guidance on legal operator for environmental permits.</p>
<b>The facility</b>	
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>
<b>The site</b>	
Extent of the site of the facility	<p>The operator has provided plans which we consider are satisfactory, showing the extent of the site of the facility. The plan is included in the permit.</p>

Aspect considered	Decision
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 reviewing in order to comply with requirements of Article 22 of the Industrial Emissions Directive. We have therefore imposed an improvement condition IC7 requiring the operator to review and update their site condition report include at least the following:</p> <ul style="list-style-type: none"> <li>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.</li> <li>ii) reference to any historical spillages, the chemicals involved and locations baseline soil sample results and groundwater data. We have included an improvement condition (IC7) in the permit to review the site condition report to ensure Article 22 of the Industrial Emissions Directive is complied with.</li> </ul> <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	<p>The operator has provided a waste management plan which we consider is satisfactory.</p>
Biodiversity, heritage, landscape and nature conservation	<p>The application is within the relevant distance criteria of a site of heritage, landscape or nature conservation, and/or protected species or habitat.</p> <p>We have assessed the application and its potential to affect all known sites of nature conservation, landscape and heritage and/or protected species or habitats identified in the nature conservation screening report as part of the permitting process.</p> <p>We consider that the application will not affect any sites of nature conservation, landscape and heritage, and/or protected species or habitats identified. These include: South Dorset Coast SSSI, St Albans Head to Durlston Head SAC, Dorset Heaths (Purbeck and Wareham) and Studland Dunes SAC, Isle of Portland to Studland Cliffs SAC, Dorset Heaths SAC, Dorset Heathlands SPA and Poole Harbour SPA.</p> <p>We have not consulted Natural England on the application. The decision was taken in accordance with our guidance.</p> <p>An assessment form has been completed for information.</p> <p>Emissions to air: The H1 assessment provided with the application assessed the impact from emissions to air from the 2 storage tank vents. It concluded that whilst the long term emission assessment level (EAL) for n Hexane and benzene were exceeded, overall all emissions screened out as insignificant and therefore didn't require further assessment for impact.</p> <p>As such we have concluded that these emissions to air will not affect the sites identified above. This permit application is part of a sector review, and activities have not changed on site since the previous permit and impact assessment. We have include an improvement condition IC 4 to require the operator to review an implement a gas management plan to reduce these emissions to air in accordance with BAT (best available techniques).</p>



Aspect considered	Decision
	Emissions to water: Any runoff from the site is rainfall from non-process areas of the site, so is uncontaminated and non-polluting. Any potentially contaminated water collected in site bunds is sent offsite to Wytch Farm for treatment. There is therefore no impact on the sites identified above.
<b>Environmental risk assessment</b>	
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>
<b>Operating techniques</b>	
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.</p> <p>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 we have included specific improvement conditions (IC4, 5 and 6) 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 screen out as insignificant	<p>All air emissions have been screened out as insignificant, or do not require further assessment.</p> <p>We have included an improvement programme (ICs 4, 5 and 6 ) under this permit review to ensure that gas management at all sites is BAT and in line with our sector guidance.</p> <p>We consider that the emission limits included in the installation permit reflect the BAT for the sector.</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</p>

Aspect considered	Decision
	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.
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 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>
<b>Permit conditions</b>	
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>
Pre-operational conditions	Based on the information in the application, we consider that we do not need to impose pre-operational conditions.
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 to ensure that the standards of operation for the sector are consistent and reflect those currently required by newly permitted sites (since 2013) and meet the requirements of our Onshore Oil and Gas Sector Guidance, August 2016.</p> <p>The following ICs have included in this permit to address the gap analysis responses we received from operator to demonstrate compliance with our Onshore Oil and Gas Sector Guidance, August 2016. This is explained in our key issues above.</p>

Aspect considered	Decision
	<p><b>IC1 - Secondary and Tertiary Containment Review</b></p> <p>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.</p> <p><b>IC2 - Leak Detection and Repair Plan</b></p> <p>Improvement condition IC2 is necessary because 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.</p> <p><b>IC3 - Environmental Management System Review</b></p> <p>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</p> <p>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</p> <p>The specific management requirements include: bund filling procedures, testing of the membrane and monitoring to confirm integrity of the re-injection well. The last point is to cover any remedial measures in event of a failure</p> <p><b>IC4 - Gas management</b></p> <p>Improvement condition IC4 is necessary as the operator does not appear currently to be applying appropriate measures for the management of waste gas arising from their production of hydrocarbons.</p> <p>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.</p> <p>We have included improvement condition 4 which requires the operator to submit for written approval a plan identifying their identified method for reducing the impact of gas emissions to atmosphere.</p> <p>Gas management is necessary to reduce the environmental and human health impacts of emitting natural gas directly to atmosphere.</p> <p><b>IC5 - Air emissions monitoring</b></p> <p>Improvement condition 5 is necessary as the site features emissions to air with the potential to cause pollution. We have applied improvement condition 5 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</p>

Aspect considered	Decision
	<p>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. Where appropriate, we will use these monitoring results to set appropriate assessment levels or compliance limits for the operator to comply with in future.</p> <p>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.</p> <p><b>IC6 - Vapour recovery</b></p> <p>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.</p> <p>Vapour recovery is necessary both for safety reasons and also to reduce the environmental impacts of storing, loading, transporting and unloading hydrocarbons.</p> <p>The timescale for compliance with this improvement condition has been tied into IC 4.</p> <p><b>IC7 - Site Condition Report Review</b></p> <p>Improvement Condition IC7 is necessary because the operator is required to produce a Site Condition Report 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 Industrial Emissions Directive.</p> <p>The Operator has provided a Site Condition Report with the application, but this does not contain baseline data to confirm the current state of any soil and/or groundwater contamination, or confirmed that existing soil and groundwater data for the site enables a baseline to be defined for the site.</p>
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>Gas vented (calculation method)</p> <p>Hydrogen Sulphide</p>

Aspect considered	Decision
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 storage tank vents, carry out ambient air monitoring and gas to oil ratio monitoring.</p> <p>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.</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>
<b>Operator competence</b>	
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>
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>
<b>Growth Duty</b>	
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</p>

Aspect considered	Decision
	<p>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>
<b>Further Legislation</b>	
<p>Schedule 22 to the EPR 2016 – Water Framework and Groundwater Daughter Directives</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.</p>
<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
- Food Standards Agency
- Health and Safety Executive
- Mineral Planning Authority

No objections were received from the all the Statutory consultees whom we consulted. No objections were received from members of the public.