# Permitting decisions

## Variation to permit

We have decided to issue the variation for Scampton North Oilfield operated by Island Gas Limited

The variation number is EPR/LP3831CE/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; and
- 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; and
- Add a previous silent site as part of the permitted area.

**Purpose of this document**

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 oilfield is located approximately 8.5km north of Lincoln. The field features three discrete sites, only two of which remain actively producing with 4 producing wells. Site A, which is a silent site, is a small 'wedge-shaped' piece of land located between RAF Scampton and the A15 trunk road. Site B and C are located approximately 1.5km and 0.9km west of Site A respectively. Site B and C each comprises actively producing wells as listed in table 1 below, a number of bulk fluid storage tanks and various other ancillary equipment.

Crude oil together with admixed reservoir water is pumped to on site storage tanks by pipeline. The storage tanks are emptied as required by road tanker and the admixed oil and water is transferred to Welton Gathering Centre or Gainsborough Gathering Centre for separation prior to export to the refineries. The produced water is dealt with at the gathering centre. Associated gas, released when oil is depressurised, is vented to the atmosphere. A pipeline is in place to transfer annulus gas from Scampton C wellsite to Scampton B wellsite. This gas is vented to atmosphere. Annulus gas from Scampton B is also vented to atmosphere. Electrical power for the sites making up the installation is from the grid. Each well site is capable of operating independently.

The installation has no SSSI's within 2 km or European designated sites within 10 km.

Table A below lists the wells by site and current status producing or suspended. Commingled fluids oil/water are transferred by road tanker to either Welton or Gainsborough central gathering centres for separation. The onsite storage tanks have vent stacks to allow gas entrained within the production fluids to escape to atmosphere via a single vent point.

**Table A: Status of wells at Scampton North Oilfield**

| Site | Well Number | Status |
|---|---|---|
| Scampton North A | A1 | Suspended |
| Scampton North B | B1 | Producing |
| | B2 | Producing |
| Scampton North C | C3 | Suspended |
| | C6 | Producing |
| | C7 | Suspended |
| | C8 | Suspended |
| | C9 | Producing |

**Emissions**

The principal releases into the environment comprise:

(a) Emissions to air gaseous hydrocarbons from separation of volatiles in storage.

(b) Emissions of gaseous hydrocarbons from the road tanker by displacement on loading.

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

# 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 storage and handling site. This is for bulking up, separation of oil and produced water only and distribution with no wells or production infrastructure on site.

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.

**Description of the changes introduced by the variation**

This is a variation to add 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 well maintenance treatments including acid wash, hot water and hot oil wash, wax removal and well workover operations. The variation will also add a previously silent well site, Scampton A, as part of the permitted area.

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.

**Mining Waste Activities**

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 well maintenance treatments during the lifetime of hydrocarbon production from the well, as part of routine maintenance activities. These will include hot water and hot oil washing, wax dissolver treatment and acid treatment which are described further below.

**Routine well maintenance activities**

**Acid Wash**

During the oil production process, scale from minerals in the produced water mainly calcium carbonate can deposit on rods, tubes, pumps and casing perforations. This scale is typically dissolved from the system by using a 15% solution of hydrochloric acid with water. The dilute acid is circulated down the well at a low pressure to the perforated section of the well at depths between 1617 and 1849 metres below ground level. The acid reacts with the formation and is neutralised. The neutralised water the dissolved scale is returned to surface. This operation does not involve the pressurization of the circulating fluids in order to penetrate the reservoir.

We have considered the acid wash treatment as described in the waste management plan and concluded that it meets the groundwater activity exclusion as described in Schedule 22 Paragraph 3.3(b) of the Environmental Permitting Regulations.

**Hot Water Operation**

The hot water operation involves the use of hot water to remove wax deposits within subsurface tubulars and pipework.

Water, either potable or produced, is heated and pumped down the well annulus and returns to the surface via the tubing. During this activity the well pumping system is operating. This process dissolves wax that is deposited on the rods and tubulars. The melted wax returns to the oil phase.

All water is returned to surface where it is recovered and transferred offsite for processing.

We have considered the hot water operation as described in the waste management plan and concluded that it meets the groundwater activity exclusion as described in Schedule 22 Paragraph 3.3(b) of the Environmental Permitting Regulations.

**Wax Dissolver Treatment**

Wax dissolver treatments may be carried out when the asphaltines and waxes that are deposited on the tubulars are not dissolved using hot water or oil. A wax dissolver chemical is used as the dissolving liquid and is circulated down the well annulus and is returned to the surface through the tubing in the oil phase. There may be limited contact with the reservoir formation in the perforated section of the well and the product is fully recovered in the oil phase and stored in the crude oil storage tank at the surface.

We have considered the acid wax dissolver treatment as described in the waste management plan and concluded that it meets the groundwater activity exclusion as described in Schedule 22 Paragraph 3.3(b) of the Environmental Permitting Regulations.

**Well workovers**

Despite the preventative maintenance measures taken above there will be instances where a well workover is required and a workover rig is temporarily installed on site to workover the well. These operations may generate extractive mining waste. We have varied the permit to allow the operator to carry out a mining waste operation involving the management of extractive waste from production activities, not involving a waste facility. The operation will include the management of extractive waste generated by well workover

**Improvement Programme**

We have imposed improvement conditions for the following reasons

**IC1 - Secondary and Tertiary Containment Review**

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.

**IC2 - Leak Detection and Repair Plan**

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.

**IC3 - Environmental Management System Review**

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 usual compliance audit in future.

**IC4 - Gas management**

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.

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 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.

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

**IC5 - Air emissions monitoring**

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 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 4 to ensure they are applying 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.

**IC6 – Site surface water management plan**

Improvement condition IC6 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.

**IC7 - Site Condition Report Review**

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.

The Operator has not provided a Site Condition Report with 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.

**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 | The application was publicised at https://www.gov.uk/government/publications/ln2-3pu-island-gas-limited-environmental-permit-application-advertisement because of the high levels of public interest in the onshore Oil and Gas Sector. The application itself is NOT high public interest.<br>We consulted the following organisations:<br>Local Authority, Environmental Protection- Nottinghamshire County Council; Food Standards Agency; Oil and Gas Authority;<br>Health and Safety Executive and Mineral Planning Authority- Nottinghamshire County Council |
| **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 | 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.<br>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. |
| **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. The plans are included in the permit. |
| Site condition report | 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 IC7 requiring the operator to review and update their site condition report include at least the following:<br>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.<br>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 |

| Aspect considered | Decision |
|---|---|
| | Emissions Directive is complied with.<br><br>The decision was taken in accordance with our guidance on site condition reports and baseline reporting under the Industrial Emissions Directive. |
| Waste management plan | The operator has provided a waste management plan which we consider is satisfactory. |
| Biodiversity, heritage, landscape and nature conservation | The application is not within the relevant distance criteria of a site of heritage, landscape or nature conservation, and/or protected species or habitat. |
| **Environmental risk assessment** | |
| Environmental risk | We have reviewed the operator's assessment of the environmental risk from the facility.<br>The operator's risk assessment is satisfactory.<br>There will be no increase in emissions as a result of this variation, and consequently no increase in environmental risk. |
| **Operating techniques** | |
| General operating techniques | 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.<br>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. |
| Odour management | 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.<br>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. |
| Noise management | 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 |

| Aspect considered | Decision |
|---|---|
| | pollution outside the site.<br><br>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. |
| **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 | We have varied the permit as stated in the variation notice.<br><br>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. |
| Improvement programme | Based on the information on the application, we consider that we need to impose an improvement programme.<br><br>Based on the information on the application, we consider that we need to impose an improvement programme.<br><br>We have imposed an improvement programme for reasons we have outlined in "**Key issues**" above. |
| Emission limits | 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 $H_2S$ into the atmosphere during venting.<br><br>ELVs equivalent parameters have been set for the Hydrogen sulphide in Schedule 3 of the permit.<br><br>Hydrogen Sulphide<br><br>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 manage emissions |
| Monitoring | 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. The Operator will keep records of the data collected, which must be submitted to the Environment Agency on a regular basis.<br><br>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. |

| Aspect considered | Decision |
|---|---|
| | 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. |
| Reporting | We have specified reporting in the permit.<br>The reports will enable information on trends to be assessed and interventions to be carried out when required.<br>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. |
| **Operator competence** | |
| Management system | 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.<br>The decision was taken in accordance with the guidance on operator competence and how to develop a management system for environmental permits. |
| Relevant convictions | The Case Management System and National Enforcement Database have been checked to ensure that all relevant convictions have been declared.<br>No relevant convictions were found. The operator satisfies the criteria in our guidance on operator competence. |
| Financial competence | There is no known reason to consider that the operator will not be financially able to comply with the permit conditions. |
| Financial provision | There are no financial provision requirements under this permit. |
| **Growth Duty** | |
| Section 108 Deregulation Act 2015 – Growth duty | 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.<br>Paragraph 1.3 of the guidance says:<br>"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."<br>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.<br>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. |

# Consultation and web publicising

The following summarises the responses to consultation with other organisations, our notice on GOV.UK for the public, and the way in which we have considered these in the determination process.

The application was publicised on the GOV.UK website at https://www.gov.uk/government/publications/ln2-3pu-island-gas-limited-environmental-permit-application-advertisement because of the high levels of public interest in the onshore Oil and Gas Sector. The application itself is NOT high public interest.

**1) Consultation Responses from Statutory and Non-Statutory Bodies**

We consulted the following organisations:

- Local Planning Authority – West Lindsey District Council
- Mineral Planning Authority -Lincolnshire County Council
- Environmental Health England
- Public Health England
- Director of Public Health England

No objections or concerns were raised by the Statutory Authorities.

**2) Consultation Responses from Members of the Public and Community Organisations**

11 responses were received from the public and 3 were from the following Non-Governmental Organisations, Frackfree Groups of Lincolnshire, Friends of Earth and Quakers and Frack free United.

The responses raised common concerns which we have addressed as follows:

i) **Inadequate consultation**

Concerns were made that the Environment Agency must conduct much fuller and more comprehensive public engagement by way of regular face to face meetings.

We carried out consultation on the Application taking into account the Environmental Permitting Regulations and our statutory Public Participation Statement and the requirements of Article 8 of the Mining Waste Directive (MWD).

We advertised the Application by a notice placed on our website, which contained all the information required by the regulations, including making the application documents available online. We also stated where copies of the application could be viewed by anyone interested.

We have discretion as to whether to carry out “minded to” consultation on draft permits for sites or public engagements. We may do so for sites of High Public Interest. The decision to do so is not solely based on the number of responses we receive as part of our standard 4 weeks consultation. It is also based on complexity of activity and the overall environmental risk associated with the application. This site has been in existence for many years and is not classified as a site of high public interest and we have decided that a “minded to” consultation is not warranted.

ii) **Pollution to groundwater**

Concerns were raised that the proposed acidisation and other well maintenance activities will result in pollution of groundwater.

The use of acid and other well maintenance activities is discussed in detail within the key issues section above. We have fully considered the proposed acid wash, hot water washing and wax dissolver treatments that are used in the maintenance activities related to oil exploration and production. We have reviewed the well maintenance treatments described in the application and we are satisfied that there will be no discernible impact on groundwater. We consider the proposed techniques as described in this application to be of a quantity and concentration so small as to obviate any present or future danger of deterioration in the quality of the receiving groundwater in accordance with Schedule 22 Paragraph 3.3(b) of the Environmental Permitting Regulations and, therefore a permit will not be required.

We have also published further information on the use of acid at oil and gas exploration and production sites at https://consult.environment-agency.gov.uk/onshore-oil-and-gas/onshore-oil-and-gas-regulation-information-page/supporting_documents/Acidisation%20FAQs%20January%202018.pdf

iii) **Proposed activities are unsustainable**

Concerns were raised that the activities to be permitted were being unsustainable.

In section on Key Issues above, we have comprehensively described the activities proposed by the operator. It is only wastes that arise from these sources that can be managed.

We do not directly regulate the mining activity, we regulate the waste that is generated from mining. The permit is for the management of extractive waste from production of mineral resources, including storage of oil. In determining the permit we need to be satisfied that the waste is managed in accordance with the regulations.

However the operator is limited to managing waste, from the specified activities set out in the permit and waste management plan. In other words, they cannot go beyond the activities that we have described in section 3 above. Should the operator wish to proceed to using further prospecting and/or extraction techniques, they will need to apply for a variation of the permit which will be considered in the usual way.

iv) **Human health impacts, including stress**

The Health Protection Agency have raised no objection and we are satisfied that the activities we are permitting will not give rise to significant pollution or any emissions that will cause harm to human health, and as such there is no objective reason for anyone to be stressed.

v) **Suitability of the Risk Assessment**

Concerns have been raised about the adequacy of the Applicant's Risk Assessment, whether it identified all the risks and categorised them correctly.

We have reviewed the assessment, and we are satisfied it complies with our relevant guidance and that it identifies and covers all appropriate risks and that measures are in place to address them.

Conditions 3.1 and 3.2. of the permit applies controls on fugitive emissions. We have included condition 3.5.1. that will require the Operator to monitor point source emissions to air.

vi) **No to fracking**

There were concerns that the proposed permit variation will lead to the operator carrying out fracking activities.

The permit does not allow the Operator to carry out hydraulic fracturing activities. In table S.1.1. of the permit, we have specified that fracking is not permitted. Where hydrochloric acid is used in the acid wash for well maintenance this is done in accordance with the requirements for an exclusion from a groundwater activity, often referred to as meeting the requirements for 'de-minimis' as set out in our published guidance (https://www.gov.uk/government/publications/groundwater-activity-exclusions-from-environmental-permits/groundwater-activity-exclusions-from-environmental-permits#de-minimis).The operator is limited to managing waste, from the specified activities set out in the permit and waste management plan. In other words, they cannot go beyond the activities that we have described in section 3 above. Should the operator wish to proceed to using further prospecting and/or extraction techniques, they will need to apply for a variation of the permit which will be considered in the usual way.

vii) **Reinjection of produced water at Gainsborough**

Concerns were raised that the transfer of co-mingled water to Gainsborough is not regulated and could result in earthquakes at Gainsborough site.

Produced water from Scampton has previously been reinjected at either Gainsborough or Welton Gathering Centres. These sites have separate permits from the Environment Agency which allow for reinjection of produced water under controlled conditions. The permits for Gainsborough and Welton Gathering Centre, EPR/RP3937YT and EPR/GP3331 respectively, which allow for reinjection at these sites, have been determined separately from this application.

**Other matters outside the scope of this permit Application that the public have commented on which may be more relevant to Applications for other permissions.**

**Climate change and energy policy**

Policy is made by the Government and the policy on exploitation of Shale Gas is no different to that of any other fossil fuel. The policy states “We aim to maximise the economic recovery of oil and gas from the UK’s oil and gas reserves, taking full account of environmental, social and economic objectives”.