



Environmental Information Request No: 201703415

1 message

Dave.Salmon@hse.gov.uk <Dave.Salmon@hse.gov.uk> To: xxxxxxxx@xxxxx.com

Tue, Apr 11, 2017 at 10:03 AM

Dear Xx Xxxxxxx

Environmental Information Regulations Reference No: 201703415

Thank you for your request for information about:

Brockham Oilwell Site 1 Feltons Farm, Old School Lane, Brockham, Betchworth, Surrey RH3 7JP

Your request was received on 21 March 2017 and I am dealing with it under the terms of the Environmental Information Regulations 2004.

I have separately answered each of the questions you have raised in turn below:

1. I'd like to request a copy of the HSE approval granted to Angus Energy in November or December 2016, as reported here at the link below. Was the approval to drill a side track well?

<http://www.angusenergy.co.uk/wp-content/uploads/2016/12/RNS-Angus-receives-OGA-approval-and-commences-operations.pdf>

The Health and Safety Executive do not grant approvals for borehole drilling operations. Borehole site operators are required to notify the HSE of certain work activities under the requirements of the Borehole Sites and Operations Regulations 1995.

HSE inspect notifications against regulatory requirements, industry standards and good practice to ensure that the proposed operations are such that, so far as is reasonably practicable there can be no unplanned escape of fluids, and that the risks to people's health and safety are as low as is reasonably practicable. If HSE are not satisfied that this is the case, they may take enforcement action.

The well notification submitted by Angus Energy was for the partial abandonment of the Brockham X4 well and to drill a sidetrack from the partially abandoned well.

2. I'd like to request clarification on communications between the Surrey County Council's planning authority and the HSE, and between Angus Energy and the HSE, exchanged between January 16 and 18. This regarded night time working at the site, which constituted a breach of the existing planning permission under which works were taking place (Ref. MO 06/1294). According to an email from the council to myself dated 18 January, the council's planning team allowed night working to continue for a further 6 days at the advice of the Health and Safety due to maintenance work taking place on a 'live' well. This was later clarified by the council as hydrocarbons bypassing isolation plug within the well. Could you please clarify the following:

a) There are several wells on site, could you please confirm which well was being worked on and 'live'?

The well that was being worked on was Brockham X4 (Well reference LR/24-X4)

b) What was HSE's understanding on Jan 16-18 of the nature of the works: were these maintenance works on existing well or drilling of a new borehole?

The well notification submitted by Angus Energy was for the partial abandonment of the Brockham X4 well and to drill a sidetrack from the partially abandoned well.

c) I'd like to request to see a copy of the communications between the SCC and HSE, and between Angus Energy and the HSE regarding the reasons for night time working and HSE's advice to allow it?

HSE were contacted by SSC planning on the 17th January 2017 and advised that Angus Energy had informed them that the Brockham X4 well was live and asked for advice on if the events constituted an emergency requiring 24 hour operations. Our response is copied below.

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Thanks for sharing your e mail last night – it asks more questions than it gives answers

I haven't heard from Angus Energy yet, but have sent an e mail requesting additional information which is to be answered by tonight.

In answer to your questions

- 1. We are unsure as to the actual conditions at the site but generally speaking there was no reason why the well could not have been closed back in and any well kill operation conducted in daylight hours*
- 2. Again we are unsure of the actual conditions but if the well has been circulated to kill fluid then the well is no longer "live". It would appear though that there has been a recharging of the hydrocarbon producing zone which is bypassing the isolation plugs resulting in hydrocarbons in the well and initial pressure at surface. It may be prudent to allow Angus Energy to abandon this section of hole in the most efficient manner if they have all the necessary equipment on site i.e. allow 24 hour working.*

I hope this is of some help.

Please contact me if I can be of assistance

Regards

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3. Working on a 'live' well for over a week and hydrocarbons bypassing isolation plug, both sound like potentially dangerous situations. Did the HSE visit the site as a matter of urgency after these reports?

Working on any well requires appropriate measures to be put into place to control risks and avoid danger. HSE were satisfied that measures were in place to control risks and inspected the site on the 26th of January 2017.

4. When did the HSE visit the Brockham site during the months of Dec 2016 and Jan 2017? Is it possible to see any reports from these visits?
HSE carried out an onsite inspection on the 26th of January 2017. This report can be partially disclosed and a copy is attached. Some personal Information is being withheld by virtue of regulation 13(1) (personal data).

5. I understand that the HSE have inspected the site with colleagues from Surrey County Council and the EA on 26 January. What was the HSE's understanding of the nature of the works carried out at the site at that time?

The HSE were always of the understanding that the Brockham X4 well was to be partially abandoned and side tracked – these operations would at some stage involve the drilling of a new formation. On the 26th of January drilling had been completed.

6. Angus energy reported on 3 March that the works involved drilling of a new sidetrack, this was without the Surrey County Council's planning permission. It was reported on BBC 1 London on Thursday, 9 March. If the HSE's understanding in mid-January was that the works were maintenance of existing well, can the HSE guarantee a proper design of the new sidetrack? On what basis was your understanding?

HSE has assessed the design of the abandonment of Brockham X4 and the new sidetrack and have no concerns over its design.

7. The locals observed that between 13 and 25 January, most of the work at the site was taking place at night, and we can now safely assume this was drilling of a new borehole. Given the short period between the visits from authorities, and the fact Angus seem to have worked hastily and largely under floodlights, I am seriously worried about the integrity of the well. Is the HSE planning on inspecting the site and the newly drilled borehole to ensure things are safe for the local residents or the workers.

HSE have assessed the information provided by Angus Energy for the well operation and drilling of the sidetrack and have found no concerns over the integrity, and as such inspections will be based on future work activities at this well site.

8. Lastly, is there any way that the HSE can stop further development at the site until planning permission from the council is in place?

HSE inspectors have powers of enforcement which can be used if there is a breach of health and safety legislation, which can include prohibiting work activities. To date HSE has found no breach of health and safety legislation and therefore would have no reason to take enforcement action.

Prior to production (or testing) of hydrocarbons, Angus Energy will need to submit a notification for the completion (and/or testing) of the Brockham X4Z well. If the submitted notification is compliant with health and safety legislation, then the HSE would have no reason to take enforcement action.

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If you have any queries about this letter, please contact me. Please remember to quote the reference number above in any future communications.

If you are unhappy with the decisions made by HSE you may ask for an internal review within two calendar months of the date of this letter by writing to me.

If you are not content with the outcome of the internal review you have the right to apply directly to the Information Commissioner for a decision. The Information Commissioner can be contacted at:

The Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Tel: 01625 545700

Fax: 01625 524510

Email: mail@ico.gsi.gov.uk

Website: <http://www.informationcommissioner.gov.uk>

Yours sincerely

David Salmon

FOI Officer

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www.hse.gov.uk