

## Disputing the 'Facts'

Rathlin Energy (UK) Limited  
West Newton B Planning Application  
Fact and Evidence-Based Consultation

September 2016  
Final Version

## FOREWORD

As part of the planning application documentation submitted to East Riding of Yorkshire Council (ERYC) for their well site, West Newton B, Rathlin Energy (UK) Limited included a document entitled “Fact and Evidence Based Consultation”. The copy of the document, included on ERYC's planning portal was of such poor quality we have been forced to transcribe the relevant page:

### *FACT AND EVIDENCE-BASED CONSULTATION*

*“Like many sectors, the oil and gas industry generates an enthusiastic and well-meaning following. Many of these followers have no direct experience in oil and gas, or in science or engineering and this can generate discussions, debates and observations that are not always correct. That has certainly been the case here in East Yorkshire in recent months. This space in our information session is designed to address some of the most common misconceptions about our work.*

*Firstly, it is important to begin with some brief facts:*

*The work at our current well-site at West Newton is now complete and we remain encouraged by what we have found following our testing programme. All of our work was overseen by Rathlin Employees and monitored closely by independent regulators. We have remained consistently compliant with all regulations and conditions of consent in everything that we have done.*

*Despite regular visits by the government's independent regulatory professionals, there have been suggestions that we have:*

- *Breached our health and safety obligations – **this is completely untrue.***
- *Breached our environmental obligations – **this is completely untrue.***
- *Created a well that failed and was unsafe – **this is completely untrue.***
- *Created noxious and dangerous odours from our site – **this is completely untrue.** It is fair to say that there have been some localised and intermittent naturally occurring odours that resulted in us implementing a new odour management plan. We brought the matter under control quickly; we were not forced to close down the site as has been suggested.*
- *Vented gas unsafely and illegally – **this is completely untrue.***
- *Contaminated neighbouring fields and crops – **this is completely untrue.** (and this allegation is potentially damaging to the local farming community)*
- *Poisoned local wildlife – **this is completely untrue.***
- *Broken environmental and health and safety rules on flaring – **this is completely untrue.***
- *Not communicated about our work – **this is completely untrue.**”*

## BREACHED HEALTH AND SAFETY REGULATIONS

Rathlin Energy stated:

*“Breached our health and safety regulations – this is completely untrue.”*

*“On 28 August 2014 the Environment Agency carried out an inspection at the West Newton well site. The findings, stated to be for an inspection of waste operations, were recorded in EPR Compliance Assessment Report ID 400996/0219063. The inspecting officer found the following:*

*Inventory of substances stored on site*

*A copy of the inventory of hazardous materials on site was requested. The well site supervisor was able to access an inventory document via an email on his mobile phone. Due to poor IT links at the site it took 15 minutes to forward the email to an onsite laptop and print out the inventory. The inventory did not have a date or version number and listed some materials that have been removed from site.*

*Action 2: Make the hazardous materials inventory a controlled document as part of the EMS with a version number and date and update it to reflect the substances stored on site. Timescale 8 September 2014*

*The COSHH store was inspected. It was not possible to inspect all the contents as it was being used to store a large number of empty plastic bags contaminated with product residue which were awaiting disposal. It was reported that these are to be transferred to an enclosed skip. The COSHH store will be inspected again during a future site visit.*

*Outside storage areas were also inspected.*

*The following substances were present which are not listed on the chemical inventory in appendix 5 of Waste Management Plan RE-05-EPRA-WN-005 Rev: 1.00 submitted as part of the permit application:*

*3 off empty 25kg cans of ‘Brad-tech 6035’ (stored on banded pallet)  
2 off 205 litre barrels of monethylene glycol (stored on banded pallet)  
2 off 205 litre barrels of methanol (stored in drip tray)*

*Actions Required.*

*Make the hazardous materials inventory a controlled document as part of the EMS with a version number and date and update it to reflect the substances stored on site. Confirm what the substances not listed on the appendix 5 chemical inventory were/are used for on the well site (refer to text details).*

*Action 3: Confirm what these substances were/are used for on the well site.  
Timescale: 8 September 2014.”*

It is clear from the non-conformances recorded by the Environment Agency that Rathlin Energy had incorrectly managed the Control of Substances Hazardous to Health (COSHH) regulations.

The COSHH Register did not record some of the hazardous materials held on site, some of the substances held were not listed in the chemicals inventory of the Waste Management Plan submitted at the time of application for its operating permit.

There was no register held on site, had there been an emergency situation involving the COSHH store up-to-date information as what substances were involved would not have been available.

The non-conformances noted above breached conditions “1.1.2 failing to keep records that allow proper management of operations”, “2.3.1(a) failing to use appropriate procedures in operating the site” and “2.3.1(b) required to provide revised documented procedures to the Environment Agency”.

When requested by the Environment Agency to correct these non-compliances within 10 days Rathlin Energy failed to do so and had to be reminded 22 days later that it had not complied with the requirements of the Environment Agency in correcting these non-conformances.



Currently the majority of the work involving the UK on shore gas and oil industry is covered by off shore regulations. The Health and Safety Executive provide detailed information on their website with information sheet OCM8 covering the storing of chemicals. The advice covers good practice for storing chemicals with key points that “help to reduce exposure to an adequate level” including check safety data sheets and instructions on access and storage.

Rathlin Energy breached Health and Safety Regulations –  
**THIS IS COMPLETELY TRUE**

## BREACHED OUR ENVIRONMENTAL OBLIGATIONS

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Rathlin Energy stated:

*“Breached our environmental obligations – this is completely untrue.”*

The Government’s Department for Environment, Food & Rural Affairs states that *“noise can have an effect on human health, amenity, productivity and the natural environment”* with the World Health Organisation identifying *“environmental noise as the second largest environmental health risk in Western Europe”*

West Newton A well site is situated in a rural setting that is extremely quiet and flat with few natural sound barriers resulting in a tendency for anthropological noise to carry substantial distances. Low frequency sounds, such as those emitted by drilling, travel far. The topography of the land and low background noise was a major consideration when considering the impact of noise generated through drilling processes. The following statement by Spectrum Acoustic Consultants in the Noise Impact Assessment and included in the planning application highlights this.

*“As indicated by the results, background LA90 noise levels at the nearest community locations to this exploration well site are at a low level, with mean night time levels falling to below 30dB(A) at both locations. Daytime and evening background noise levels are also at low levels of 38dB(A) and 30dB(A) respectively. The low background noise levels are, however, consistent with the rural nature of the environment around this well site, reflecting the absence of any significant steady noise sources”.*

Following complaints from Residents to the Environment Agency CAR 400996/0219063, was issued on 28 August 2014. The findings of the inspection revealed already high noise levels were exacerbated by the doors of the mud pump container being kept open in an attempt by on-site contractors and employees to mitigate overheating issues. Although Heras Fencing with acoustic panelling was placed around the base of the rig in an endeavour to counteract the noise it proved to be ineffective as residents in Marton, Withernwick and West Newton reported excessive noise emanating 24 hours a day from the site.

Rathlin Energy breached their environmental obligations –  
**THIS IS COMPLETELY TRUE**

## CREATED NOXIOUS AND DANGEROUS ODOURS FROM OUR SITE

Rathlin Energy stated:

*“Created noxious and dangerous odours from our site – this is completely untrue.”*

*“It is fair to say that there have been some localised and intermittent naturally occurring odours that resulted in us implementing a new odour management plan. We brought the matter under control quickly; we were not forced to close down the site as has been suggested.”*

Flaring, or the burning of natural gas, is either discouraged or against the law in most areas of the world. However, flaring can be permitted during drilling or well testing, when there is no market for the gas or before a transport line is installed.

Rathlin Energy, after considering alternative methods of flaring, undertook to use a single tip shrouded flare through which to dispose of waste gas collected as a by-product of testing at West Newton A well site.

Night time flaring at  
West Newton A



The *Air Dispersion and Modelling Report (2013)* includes historical background checks of concentrations of Nitrogen Dioxide and Carbon Monoxide supplied by DEFRA, an estimate provided by Rathlin Energy of the volume of waste to be flared and an air quality management proposal. The report concludes, *“The modelling assessment methodology and necessary assumptions provide a conservative assessment of impact on air quality. The overall results and conclusions reached therefore incorporate a reasonable margin of comfort in spite of the inevitable uncertainty of such modelling studies.”*

*It is concluded that the flaring operations proposed during well exploration will not affect the attainment of air quality standards within the local area. For the nearest locations of human habitation and statutory designed sites, the impact of flaring on air quality is around or below the level at which it would be considered significant."*

On 10 September 2014 a complaint was made to the Environment Agency, National Incident Recording System (NIRS) number 01275977, of noxious odours emanating from West Newton A well site on 09 September 2014 at 20:05 and 10 September 2014 at 11:25.

Following the complaint an investigative visit by Environment Agency Officers was carried out. As a result of the visit Compliance Assessment Report ID 400996/0219962 was issued which concluded "*varying strengths of odour were detected, dependent upon their location, emanating from the site; the most probable influential factor was cited as being wind direction*".

The Enforcement Response contained a warning to Rathlin Energy regarding the breaches to permit and non-compliance stating "*The activities are giving rise to pollution outside the site due to odour (permit condition 3.3.1 and 3.3.2)*".

On 19 September 2014 The Guardian published an article on the noxious odours emanating from West Newton A which included interviews with residents living locally to the site. Residents statements can also be found on Social Media sites. One stated "*the smell is hideous, very distinctive, pungent and nauseous. It comes in waves. It started last week and has continued since.*" With a second complainant, living closest to the site, reporting "*I could not go outside on Friday I had to ring Environmental Health, my eyes were watering, my throat was stinging and feeling weird and I could not stop coughing.*"

It is interesting to note that Rathlin state in the Guardian article that. "*The odour is not hazardous to health.*" How could they have known this? On 10 September 2014 Rathlin Energy were ordered to carry out specific tests of emissions from the various potential sources of odour such as on site tanks and flare stack by the Environment Agency, no results from these tests had been obtained, therefore, how can they have know what chemicals or compounds of chemicals were causing the odour? It is not even clear if testing had been carried out at that time. The Guardian article was published on 19 September 2014 and Rathlin Energy responded to residents' allegations with "*The odour is not hazardous to health*"

On 24 September 2014 the Environment Agency, on assurances from Rathlin Energy, gave permission for Rathlin Energy to re-commence operations. However, no evidence can be found to substantiate Rathlin Energy had provided the Environment Agency with a working Odour Management Plan. A series of Email correspondence between the Environment Agency and Rathlin Energy shows that, on the resumption of work, odour emissions quickly became an issue with further off-site reports on 25, 26, 29 and 30 September 2014.

Rathlin Energy created noxious odours from their site –  
**THIS IS COMPLETELY TRUE**

## VENTED GAS UNSAFELY AND ILLEGALLY

Rathlin Energy stated:

*“Vented gas unsafely and illegally – this is completely untrue.”*

The Department of Energy and Climate Change in their report *“Fracking UK shale: local air quality”* states *“In the UK, all oil and gas operators must minimise the release of gases as a condition of their licence from the Department of Energy and Climate Change (DECC). Natural gas may only be vented for safety reasons. During exploration an operator may find gas that is not economic to recover, in which case they will flare it. This reduces greenhouse gas emissions by about 80% compared to venting”*.

On 10 September 2014 following a visit to West Newton A the Environment Agency Produced Compliance Assessment Report ID: 400996/0219962 Inspection in response to odour complaints received 09/09/2014 at 20:05 hrs and 10/09/2014 at 11:25 hrs NIRS ref: 01275977. *“Odour monitoring carried out with reference to Environment Agency 'H4 Odour Management' guidance document. Site inspection carried out. It was reported that the well was being 'swabbed' with all gas/liquids/solids removed being passed through the Expro well test equipment and separator. The flare was acting as a cold vent as the gas/atmosphere being brought up from the well had insufficient flow/calorific value to ignite. The same hydrocarbon type odour detected at off site location 3 was present on the site. There was a strong hydrocarbon type odour on site down wind of the brine tanks, and when officers were leaving the site there was an extremely strong hydrocarbon type odour present on site immediately down wind of the flare stack.”*

In a response to a Freedom of Information Request regarding the cold venting of gas by Rathlin Energy the following statement was received:

*“Cold venting of flammable hydrocarbon gas from well testing was not a disposal method authorised by the Environmental Permit for the Rathlin Energy UK Ltd (Rathlin Energy) West Newton 'A' Well Site.*

*We investigated the release of gas from the West Newton 'A' well site and concluded that there had been a permit breach but this has not had a significant environmental impact.”*

The question remains however, how, if Rathlin Energy had not tested the gas they were venting, did either Rathlin Energy or the Environment Agency know there was not *“a significant environmental impact”*?

Rathlin Energy vented gas unsafely and illegally –  
**THIS IS COMPLETELY TRUE**

Rathlin Energy broke environmental and health and safety rules on flaring -  
**THIS IS COMPLETELY TRUE**



## CONTAMINATED NEIGHOURING FIELDS AND CROPS

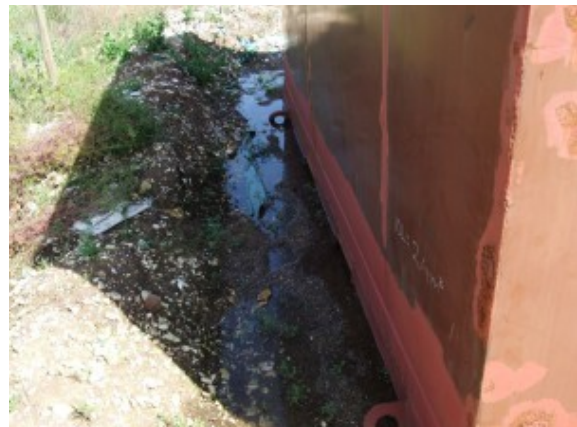
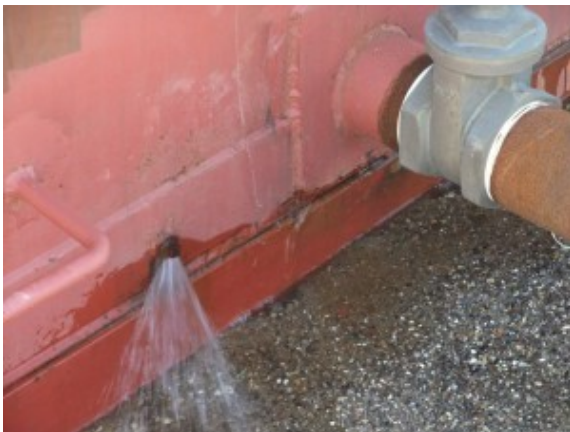
Rathlin Energy stated:

“Contaminated neighbouring fields and crops – *this is completely untrue.*”

In a statement to the High Court of Justice, Chancery Division Mr Ellerington, who farms the fields adjacent to the Crawberry Hill well site, stated: *Birdseye may also reject the pea crop if there is any over spillage from the Crawberry Hill Wellsite ditches and/or damage to the crop as a result of crop erosions associated with any spillage. (Claim no HC14E02820 Exhibit “PJE1 Para. 13)*

On 29 May 2014 a storage tank situated in the bunded area of the Rathlin Energy well site at Crawberry Hill was leaking fluid onto the neighbouring pea crop field contracted to Birdseye and farmed by Mr Ellerington.

Photographs of leaking fluid storage tank, Crawberry Hill



It was noted, through careful monitoring by Residents living locally to the Crawberry Hill well site, that repairs to the storage tank were not completed until August 2014. It can also be seen from the photographs above and Mr Ellerington’s statement to court that the fluid loss did not drain into the perimeter drainage ditch but did, in fact, drain into the pea field.

Rathlin Energy (UK) Limited clearly did not manage the leak and no written record can be found of the Environment Agency either being notified by Rathlin Energy (UK) Limited or visiting the site to inspect the leak. No records can be found that the fluid leaking from the tank was tested.

Please also see the What Went Wrong at West Newton A report for information on a hydraulic fluid spill that was never cleaned up.

Rathlin Energy contaminated neighbouring fields and crops –  
**WE WILL NEVER KNOW BECAUSE RATHLIN WILL NOT TELL US**

## POISONED LOCAL WILDLIFE

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Rathlin Energy stated:

*“Poisoned local wildlife – this is completely untrue.”*

During the Extended Well Test Environmental Activists were receiving reports from security staff that small animals were being poisoned; this was later confirmed by the Environment Agency on Compliance Assessment Report ID 400996/0222175 following a visit by their representatives on 10 October 2014. *“The operator is carrying out vermin control on site using rodenticide in bait boxes and that is believed to be contributing to the numbers of small dead mammals found in the open section of the containment ditch.”*

In an email dated 09 October 2014 Rathlin Energy wrote to East Riding of Yorkshire Council Planning Department *“Vermin control measures were implemented on the site during September 2014 following a report from the West Newton Wellsite Supervisor of an infestation of rats/field mice within the site perimeter. The rats/mice were found within the site cabins including site canteen. Preventative measures were assessed and undertaken to prevent the vermin from impacting on site equipment and personnel. The measures adopted to remove the vermin was for bait traps to be deployed around the well site with rat poison inside.*

*When undertaking the assessment for preventative measures, impact on local wildlife was assessed as low due to the perimeter fencing and to noise and movement from personnel and current operations being undertaken on a 24 hour basis.... Nets have been provided to enable daily removal of any dead animals which reduces the risk of secondary poisoning.”*

Rodenticides are non-specific pest control chemicals made for the purpose of killing rodents. Some rodenticides are lethal after one exposure while others require more than one dose. Rodents are disinclined to gorge on unknown food, thought to be due in part to their inability to vomit, preferring to eat a small amount, wait and observe whether it makes them, or other rodents, sick. This is known as bait or poison shyness and is the rationale for poisons that kill only after multiple doses.

Besides being directly toxic to the mammals that ingest them rodenticides present a secondary poisoning risk to animals that hunt or scavenge. The Health and Safety Executive state *“regulatory environmental risk assessments have concluded that the use of First and Second Generation Anticoagulant Rodenticides (FGARs and SGARs) outdoors present a higher level of risk to non-target animals (such as predatory birds and mammals) than would normally be considered acceptable.*

Activists living adjacent to the well site found the bodies of small rodents outside of the boundary of the compound which led to the conclusion that the Rodenticide being used was of a slow poisoning type.

It was also thought at the time that some of the dead animals were being eaten by other animals prior to anthropological disposal of the bodies. This was later confirmed in an anonymous message to an Activist. *“the stoats was eating the contaminated rats and voles, some people thought they were mice and tried killing them.”* Barn owls, buzzards, red kites and other species of hunting birds and animals reside in the area, these creatures are unable to differentiate between poisoned and healthy rodents as a food source.

No public record can be found of Rathlin Energy submitting any recovered dead mammals to the correct public body for species identification prior to their disposal. It is understood that the Environment Agency removed two dead rodents for identification; neither was a protected species.



Perimeter Ditch at West Newton A September 2014

In spite of Rathlin Energy's constant denials it was known that 3 pairs of Barn Owls were nesting within 800 metres of the well site. Over the past 16 months Activists and Residents have made regular visits to the site, currently suspended, and only 1 Barn Owl has been seen. The wanton poisoning of any defenceless creature is just not acceptable, by anyone's' standards.

Rathlin Energy poisoned local wildlife –  
**THIS IS COMPLETELY TRUE**

## NOT COMMUNICATED ABOUT OUR WORK

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Rathlin Energy stated:

*“Not communicated about our work – this is completely untrue.”*

In 2013 the Department for Communities and Local Development issued *“Planning practice guidelines for the oil and gas industry”* with an emphasis on community engagement and collaboration between all stakeholders. *“Pre-application engagement is a collaborative process between the prospective operator and other parties which may include: the minerals planning authority; statutory and non-statutory consultees; elected members; and local people. Each party involved has an important role to play in ensuring the efficiency and effectiveness of pre-application engagement.”*

With UKOOG stating in their community charter *“our aim is to foster open and transparent communications between industry, stakeholder groups and the communities in which we operate”*. Rathlin Energy are a member of UKOOG.

In October 2012 Rathlin Energy submitted a planning application to East Riding of Yorkshire Council to construct and undertake a core drill at the well site known as West Newton A. In late November 2012 Rathlin Energy set up an exhibition in Aldborough Village Hall to inform residents of their plans. However, the hamlet of Ellerby, with its two villages of old and New Ellerby, is situated much closer to Marton, with Old Ellerby most affected by heavy goods vehicles travelling both to and from the site. A much better choice of venue to host an information day would have been the Methodist Church at New Ellerby. The Church building is a central point for activities in the area with the trustees very amenable to their building being used in the best interests of the community; Rathlin Energy would have reached more of their target audience utilising this facility.

Of the six letters received by East Riding of Yorkshire Council in response to the planning application one was sent in querying whether a no fracking clause could be included in the planning permission, one objected to the industrialisation of the area with the other four all complaining about the lack of information on the date of the planning meeting and the general lack of information about due processes to the wider community.

*“I understand that a meeting was held on January 3<sup>rd</sup> to concentrate opinion regarding the application by Rathlin Energy (UK) Limited for full planning permission to bore for mineral exploration (petroleum) on Fosham Lane. I was not given notification of this meeting and was therefore unable to attend... I find the lack of notification to those throughout this village (apart from one recipient) regarding the meeting on January 3<sup>rd</sup> strangely coincidental, considering we are the people nearest to this proposed development. I was assured by David Montagu-Smith at the meeting held in Aldborough Village Hall on November 30<sup>th</sup> 2012 that I would be notified of the meeting to be held on January 3<sup>rd</sup> 2013 at County Hall Beverley. This did not happen although I left my name and address with your steward at the November meeting.”*

*“The one more worrying thing is that many of the local surrounding villagers don't seem to know anything about the proposed drilling site and what effect it will have on them.”*

*“As my property is closest to the proposed drilling well and having now read the recommended reasons for approval yet never having received any planning notification from East Riding Planning Dept.... I must explain that I have not intentionally taken a long time to comment but it was not made clear on the East Riding website as to when the Planning committee would meet as nowhere on the website does it explain there are three types of planning meeting i.e. a west an east and a strategic meeting and because I did not receive any planning intention notice through the post from East Riding Council it was only a day before the actual meeting that I was informed via the Hull Daily Mail as to when the case would be discussed by the Council”.*

*“It has come to my attention that the estimated number of heavy goods vehicles likely to be used in connection with this application has been increased from an initial 60 per day to 300 per day. It takes little effort to realise the extra noise, pollution, wear and tear, driving hazard and congestion on narrow or/and, winding roads that will follow.*

*As this point has not been widely publicised I wish to object to the application. I would welcome an environmental impact assessment report carried out by an independent party.*

*Also. I am surprised the application was raised at the last planning meeting; I thought this was to happen later in the new year.”*

At a community meeting, held once again in Aldbrough Village Hall, in 2015 to consult on the proposed West Newton B well site Rathlin Energy made life as difficult as possible for Residents to attend. Written invitations to the event were recommended to be obtained by email, already excluding a large sector of the population who do not have access to the internet and who were unsure about telephoning to request one. We were also informed that as well as taking the letter of invitation on the day we had to provide proof of our address. A resident, who wishes to remain anonymous, reported the following incident to No Drill No Spill:

*“I got a lift on the day with two Activists, neither of whom reside in the catchment area that qualified them to attend and both of whom knew they had to stay outside whilst I went in. On arriving at the 'open' residents meeting we were greeted by Beacon Security who refused to let us drive into the car park instead advising us we were not to be allowed into the event. In spite of our protests, and an attempt to steal my identification and invitation letter, they (Beacon Security) refused to let us in. Eventually the Police were called who confirmed I did reside in the qualifying area, had a letter of invitation and proof of identification; I was later escorted into the building. The whole situation was a pointless exercise to intimidate me into going away. Apparently 'people like me' were not wanted at the event.*

*Once inside things deteriorated, if that is possible. Not one person I spoke to could answer my questions, I was just told 'you will have to speak to them'. It was disgraceful.”*

Rathlin Energy did not communicate about their work –  
**THIS IS COMPLETELY TRUE**

## CREATED A WELL THAT FAILED AND WAS UNSAFE

Rathlin Energy stated:

*“Created a well that failed and was unsafe – this is completely untrue.”*

In 2013 Rathlin Energy drilled 3,214 metres into the Carboniferous layer, in other words they drilled a well into the Bowland Shale. Following the initial core drill things, from what information we can gather, did not go entirely according to plan.

Included in the planning application submitted to East Riding of Yorkshire Council for well testing at West Newton A Rathlin Energy was confirmation that work was undertaken in the annulus of the well to remediate pressure issues prior to, in 3<sup>rd</sup> quarter 2013, the well being suspended.

The remedial work, or 'cement job' as it was described in a report issued by the Health and Safety Executive, was carried out between 24 October 2014 and 21 December 2013 using the workover rig Enerflow ESR-550; the Cuadrilla Resources owned rig did not carry a signed Declaration of Conformity.

On 06 October 2013 Rathlin Energy submitted a report to of an incident to the regulators of a release of gas from the 18 5/8" x 13 3/8" annulus of the well.

Rathlin Energy advised the Health and Safety Executive that gas had ignited within the casing at 18 5/8" whilst being *“rough cut for the installation of the well head”*.

On 09 August 2014 Rathlin Energy submitted a report that detailed the unplanned closure of the well blowout preventer.

On 12 August 2014 the 'Regulators' were informed by Rathlin Energy of an increase in pressure. The following statement was issued by the Health and Safety Executive:

*“HSE has been informed that there is an increase in pressure between two of the well casings in the gas well at West Newton. The pressure is small and contained within the well. It is being monitored by the operators. The well is designed to allow this type of pressure build up and for it to be safely removed - "bled off". The well has be temporarily closed off by the operators and work is ongoing to determine the cause of the pressure build up and the action necessary to correct the problem. The operators are keeping HSE informed and HSE inspectors will continue to monitor the situation. There has been no unplanned release of fluids from the well.”*

With a further statement from the Environment Agency:

*“We have been in touch with Rathlin and they have confirmed that the work that was being carried out yesterday was in relation to the pressure inside the well. The well is effectively*

*“plugged” using brine (salty water). Recently a higher pressure was occurring in the well than originally anticipated. This has required more brine to be added to increase its density to deal with the higher pressure. The extra equipment brought onto the site was needed to pump in the additional brine. We are satisfied that there have been no breaches of the permit and that there is no risk of pollution from the activities that are currently being carried out. We are not aware of any damage to the well casing, or any underground activity.*

*If you would like more information about the work which Rathlin are doing, please check the website at: [www.rathlin-energy.co.uk/](http://www.rathlin-energy.co.uk/)*

*From our point of view we do not have any concerns about the environmental impact of their current activity and will not be taking any action.*

*As far as we are aware HSE have not been on site recently.”*

On 14 August 2014 well intervention equipment, including a coiled pipe, was brought onto site.



We the Residents of Holderness living around the area of West Newton A may never know what really happened at West Newton A, nor we fear will the Regulators. Freedom of Information Requests have allowed us to glean what information we can, it is, however, a slow and difficult process but we will continue to ask questions until they become so fed up with hearing from us they will, eventually, investigate Rathlin Energy and West Newton A.

Did Rathlin Energy create a well that was unsafe and failed?  
**WE CAN NOT BE CERTAIN BUT WE THINK THE ANSWER IS YES!**

## CONCLUSION

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Rathlin Energy stated:

*“The work at our current well-site at West Newton is now complete and we remain encouraged by what we have found following our testing programme. All of our work was overseen by Rathlin Employees and monitored closely by independent regulators. We have remained consistently compliant with all regulations and conditions of consent in everything that we have done.”*

If the work at the 'current well-site at West Newton' is complete why have Rathlin Energy received an extension to their planning permission to drill a second well head at West Newton A?

In response to the statement made by Rathlin Energy *“All of our work was overseen by Rathlin Employees and monitored closely by independent regulator”* we can only say that visits, by both the Health and Safety Executive and the Environment Agency, were, in the majority of cases, undertaken in response to phone calls and complaints by Residents and Activists. There was very limited, if any, independent and unscheduled visits by the 'Regulators' and even less by East Riding of Yorkshire Council officials.

*We have remained consistently compliant with all regulations and conditions of consent in everything that we have done.”* In point of fact, no Rathlin Energy you have not. 16 breaches to permits were recorded by the Environment Agency as well as various work practice recommendations and twice Enerflow ESR-550 workover rig carrying no Declaration of Conformity was deployed to West Newton A.



Caroline Foster, Field Manager  
Rathlin Energy, confirming Rathlin  
were undertaking a mini-frack