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FROM CONCEPTION TO COMPLETION

Zetland Group Limited
The Innovation Centre
Vienna Court
Kirkleatham Business Park
Redcar
TS10 5SH

Tel: [redacted]
Email: [redacted]
www.zetlandgroup.com

James Neave - Principal Planner
Planning Services - West Sussex County Council
Ground Floor Northleigh - County Hall
Chichester - West Sussex
PO19 1RH

Our Ref: ZG/UKOG/BB2023/S73/631
Date: 13th February 2024

Dear James,

APP REF: **WSCC/046/23**

LOCATION: **WOOD BARN FARM, ADVERSANE LANE, BROADFORD BRIDGE, BILLINGSHURST, WEST SUSSEX**

PROPOSAL: **THE SITING AND DEVELOPMENT OF A TEMPORARY BOREHOLE, WELL SITE COMPOUND AND ACCESS ROAD INCLUDING ALL ANCILLARY INFRASTRUCTURE AND EQUIPMENT (VARIATION OF CONDITION 1 OF PLANNING PERMISSION WSCC/002/22 EXTENDING THE PERMISSION BY 24 MONTHS TO ENABLE THE COMPLETION OF PHASE 4 SITE RETENTION AND RESTORATION)**

Further to your e-mail 5th February 2024, please see below the Applicant's (UKOG) response to the issues raised.

1: SURFACE WATER DRAINAGE

Since 2018, the Broadford Bridge Well Site has been suspended and the lack of activity is material. Run-off volumes and rates reduce when the well is no longer active and the site is free of impermeable surfaces (e.g. tanks, containers, open storage of plant, pipework and machinery). Run-off (now rainwater alone) is initially suspended in the granular aggregate (Type 6F1/6F2) loose stone layers of the well platform where natural evaporation takes place. It then slowly percolates down to the impermeable liner and is directed towards the periphery ditch system. Natural evaporation continues during this process of transition and at its point of final capture within the ditch system.

The Environment Agency (EA) permit is not time limited, it remains active and in full force. UKOG formally monitor and manage the wellhead facility in regulatory compliance with the EA and HSE and informally monitor surface water drainage which is appropriate and proportionate to the risk of contamination from a well site that has been suspended. In addition, the landowner and tenant farmers informally monitor water levels surrounding the Well Site on a weekly basis as they work the land for agriculture.

This informal system of surveillance is common at suspended sites. Over-topping of the bunded perimeter boundary has never been identified and nor has there been any evidence of exceedance in the form of washed-out crops or temporary ponding at surface (events which would have been escalated for attention by the landowner. As stated in previous correspondence, UKOG are ready to tanker but, to date, such a response has not been necessary. However, tanker provision remains a mitigation measure for deployment.

UKOG are willing to agree to a monitoring condition and would welcome indicative word acceptable to WSCC but prior to drafting, UKOG respectfully raise the following queries with regard to the need for a condition in prionciple:

- **Necessity:** the well site has been suspended for 6 years with no evidence of exceedance and the permission has been extended 3 times with surface water monitoring never being a material consideration. A condition would therefore appear in conflict with NPPF para 56 advice which states *'planning conditions should be kept to a minimum and only imposed where they are necessary'*; and
- **Relevant to Planning:** NPPF para 194 advices *'the focus of planning… should be on whether proposed development is an acceptable use of land, rather than the control of processes or emissions (where these are subject to separate pollution control regimes). Planning… should assume that these regimes will operate effectively…'.* The permit is active and in full force and the EA and HSE are the competent authorities for regulating suspended well sites. Neither body has indicated the need for a planning condition.

Once absorbed, please do let me know WSCC's intended action with regard to the imposition of a condition.

2: PLUGGING & ABANDONMENT

The site is currently in Phase 4(b) Retention, mode which means the well has been suspended through the insertion of barriers to flow, all well valves have been closed and a safety container protects the well head.

Upon entering Phase 4(a) Restoration, the well would be plugged and abandoned in compliance with the prevailing Offshore Energies UK Well Decommissioning Guidelines. The HSE would be notified of the well abandonment programme under Regulation 6 of The Borehole Sites & Operations Regulations 1995 and EA prior approval would be needed for a Closure Plan consistent with permit in force.

A workover rig similar to that shown at **Appendix A**[1] would be mobilised to Site. Cement plugs (permanent barriers to flow) would then be set within the well to ensure all distinct permeable zones penetrated by the well are isolated from each other and from the surface by a minimum of one permanent barrier. Permeable zones penetrated by the well which are hydrocarbon-bearing or over-pressured and water-bearing would be isolated by two permanent barriers from the surface (the second being a back-up to the first). Once the well is abandoned, the casing within the drilling cellar would be cut 2.5m below ground level and a steel plate welded over the top of the casing to prevent soil from re-entering the borehole.

Rig mobilisation and de-mobilisation would take approximately three days. All structures including welfare and support buildings, storage tanks, the well cellar and sump-lining would be removed. Any remaining drilling mud or cutting waste would be removed along with the pit liner and perimeter ditch-lining and disposed of at an approved waste disposal facility. During abandonment, the works would be the subject of independent assessment under The Offshore Installations & Wells (Design and Construction, etc.) Regulations 1996. Consistent with the approved timescales for development[2], Phase 4(a) would take 6 weeks to complete.

Should you require any additional information please do not hesitate to contact me.

Yours sincerely,

[redacted]

Nigel Moore B.A. (Hons) B.Pl. MRTPI
Planning Project Manager

[1] Approved as part of consent WSCC/052/12/WC which relied on the Broadford Bridge-1 Exploratory Well Site Environmental Statement (July 2012), Volume 1, Appendix 4.1: Rig Example (MR 7000).

[2] Approved as part of consent WSCC/052/12/WC which relied on the Broadford Bridge-1 Exploratory Well Site Environmental Statement (July 2012), Volume 1, Chapter 4: Project Description, Table 4.1: Timescales & Phasing of the Proposed Development

APPENDIX A: APPROVED ENVIRONMENTAL STATEMENT (JULY 2012), VOL 1, APPENDIX 4.1: RIG EXAMPLE.

MASSARENTI MR 7000

HYDRO DRILLING INTERNATIONAL S.p.A.

The "MR" series rigs, fully mechanically driven, are designed to ensure ease of operation in a wide variety of extreme terrain and climatic conditions and to enable the operator to work in areas requiring all-terrain vehicles such as in desert, swamp or jungle conditions and artic tundra. The drawworks, carrier and mast capacities are matched to provide good performances. The rig is manufactured from high strength material and equipped with heavy duty hydraulic systems capable of providing power for all the hydraulic services.

The rig is trailer mounted and is designed to satisfy the needs of quick rig-up and easily transportable unit

In order to guarantee operations on multi-well cluster, the rig is equipped with a skidding system so to reduce idle time between wells

The drilling control panel is placed in such a way to provide to the driller a complete vision of the drill floor area.

Moreover:

- All decks are checkered plate to ensure a safe walking surface in icy or wet conditions;
- All rig's components can be designed for operations ranging from - 45 °C up to + 50 °C;
- Weather protection on the drill floor area is available;
- Sound-proof shelter for engine is available.

MAIN RIG CHARACTERISTICS

DEPTH RATING
8800 Ft w/ 5" DPs
12000 Ft w/ 3 1 /2" DPs

MAST SPECs: 117Ft - Telescopic type hydraulic raising w/Guy lines tied to substructure base beams
Gross Cap. 550.000 Lbs
Static hook load 350.000 Lbs = 160 T

SUBSTRUCTURE
Height 17 Ft = 5.20 m
Rotary cap. 400.000 Lbs = 180 T
Setback cap. 250.000 Lbs = 113 T

DRILLING
D-WORKS: Massarenti MAS 2500 TR
DRIVE COMPOUND: 2 Engines
GM12V-71 acoustic housing
ROTARY TABLE: Ideco 23"
TRAVELING BLOCK: Massarenti T 430-G 175
SWIVEL: Mass. I-200

TOP DRIVE
BOWEN 250 HTP HYDRAULIC Rated load capacity 225 Ton
Maximum continuous output torque 2.200 Kg-m
At rotating speed 75 RPM
Maximum rotating speed 200 RPM
Top Drive pipe handler w/ maximum output torque cap. 3.300 Ft-Lbs






MUD SYSTEM

MUD PUMPS
MUD PUMPS: 2 x MAS 1000 Hp
Drive engine GM 16V-149T/12V149T1100-1200 HP acoustic housed
CENTR. PUMPS: 3 each 5x 6R

MUD SYSTEM
MUD SYSTEM: Tanks cap. 1130 bls = 180mc. c/w 6 mud agitators
DRLG.WATER TANK: 250 bls = 40 mc and ground reserve pit

S/SHAKER
Triple Cobra Shaker Package

DESANDER
3 x 8" cones

MUD CLEANER
Swaco 6T4 12 x 4" cones

DEGASSER
Burgess Magnavac 1000
Drive eng. SAME 75 Hp for mud treatment and mixing

WELL CONTROL EQUIPMENT

CHOKE MANIFOLD
3 1/16" – 10000 3 chokes, 2 manual and remote control

BLOW OUT PREVENTERs
Hydril MSP 21 1/4 - 2000
Hydril 13 5/8 - 5000
CIW double 13 5/8 - 5000 U
CIW single 13 5/8 - 5000 U (shear rams)

BOP CONTROL
Koomey 120 Gls (22 x 11 gls bottles) - 8 control stations

OTHER EQUIPMENT

AC RIG GENS
SCANIA 400 KVA 380 V - 3 Ph - 50 Hz - Drive SCANIA DC12-54 + backup

FUEL TANKS
23 mc cap.

RIG SITE
Housing and auxiliary equipment to run operations Firefighting equipment and safety aids

RACKING IN DOUBLE
5" DPs 9360 Ft
3 1/2" DPs 13000 Ft

DRILLSTRING
5"-19.5 Grade G105 – S135
3 1/2-13.3 Grade G105
DCs 8" - 6 ½" - 4 3/4" NT

HYDRO DRILLING INTERNATIONAL S.p.A.

Via Bruno Buozzi, 56 - 48123 Ravenna (Italy)
Tel. [redacted]
E-mail: [redacted]