



Oil & Gas Authority

21 Bloomsbury
London WC1B 3HF

Ada Zaffina

By email to: request-511549-c2609ec3@whatdotheyknow.com

Our ref: FOI-2018-0043

16 October 2018

Dear Ms Zaffina,

Thank you for your emails of 20 August 2018 in which you requested:

"Dear Oil and Gas Authority,

I'd like to request copies of communications between the OGA and Surrey County Council officers discussing links between seismic activity and oil/gas operations, especially prior to 8th August planning meeting for Brockham.

Yours faithfully,

Ada Zaffina"

AND

"There are major differences in the volume of water produced reported to the OGA (at both: Brockham and Lidsey) and water reinjected at Brockham since the start of the recordings in October 2002. Given that BRX3 was converted into a water injector in 2007 to dispose of water produced at Brockham and Lidsey:

- 1. What happened to the produced water that was not reinjected after BRX3 was converted into a re-injector?
 - i. For instance, most recent data reported shows the total volume of water produced at Brockham and Lidsey from Dec 2017 to April 2018 reported to the OGA as 190.87 m3, but only 82 m3 was reinjected.**
- 2. OGA database shows no reinjection from July 2012 to March 2018, even though oil and water production continued at both sites until early 2016. In addition, page 30 of the Angus AIM admission document dated Nov 2016 says "In preparation for the surface upgrades at Brockham, the Brockham*

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oil field was shut in on 31 January 2016. This also closed the water injection well requiring the simultaneous shut-in of the Lidsey oil field.” This suggests that that water reinjection at Brockham continued from July 2012 to Jan 2016, but this is not reported.

Indeed, the volume of reinjected water reported for the period Jan 2015 to Jan 2016 reported on page 12 of the Waste Management Plan (SLR Ref: 416.07253.00001, Version No.0, May 2017, link: <https://emea01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fconsult.environment-agency.gov.uk%2Fpsc%2Frh3-7au-angus-energy-weald-basin-no3-ltd-permit%2F&data=02%7C01%7Cfoirequests%40oqaauthority.co.uk%7Ca5e09d3b9f784885bea608d606b31fec%7Ce681c59d868e488780face36f1f21b0f%7C0%7C0%7C636703763739048531&sdata=Elshlxolm2INLdfifww0IRLjsm01R9No6Gg4a2KBq7w%3D&reserved=0>) submitted to the Environment Agency as part of the re-permitting consultation is 3,254 m3 (while the volume of reported to the OGA for the same period is 0).
Why the discrepancy? Can the OGA verify this data?

3. What is the process for verifying/auditing the numbers reported to the OGA?
4. What is the trajectory of BRX3 (water reinjector), well tops, xyz coordinates and total measured depth?”

AND

“1. Is the OGA notified when an operator performs the following injection operations/at what stage is the OGA notified?

- a. Acid wash
- b. Matrix acidisation
- c. Acid fracking

2. What information is reported (start/end date, injected volume, injection pressure)
3. Is this information available to the public?
4. What is the OGA’s definition of matrix acidisation and acid fracking?”

1. We have considered your request under the Freedom of Information Act 2000 (FOIA) and, where relevant, the Environmental Information Regulations 2004 (EIRs).
2. Please find attached a copy of the OGAs correspondence with Surrey County Council (SCC) regarding this subject.
3. You will note some of the information disclosed has been redacted. While the OGA strives to disclose as much information as we are able, some information is exempt from disclosure under one or more of the

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exemptions/exceptions in FOIA and/or the EIR. Having considered the information which falls within the scope of your request, we consider the information which has been withheld to be exempt under Section 40(2) FOIA and Regulation 13(1) EIR (personal data). A detailed explanation of the reliance on each of these exemptions/exceptions is set out below.

Section 40(2) and 40(3) FOIA and Regulation 13(1) EIR (personal data)

4. The disclosed correspondence contains the names and contact details of a number of individuals. This information is being withheld under Section 40(2) and 40(3A) FOIA and Regulation 13(1) EIRs. Section 40(2) provides that personal data is exempt from if one of the conditions in 40(3A) is satisfied. One of the conditions in Section 40(3A) is a breach of any of the data protection principles in the Data Protection Act 2018 ('**DPA**'). The data protection principles include that any processing of personal data must be fair and lawful. The provisions of Section 13 EIRs mirror those of Section 40(2) FOIA.
 5. The OGA considers that disclosure of the names and contact details of the individuals would breach the principles of fairness and lawfulness. The individuals whose details have been withheld have and are entitled to an expectation of privacy. In any event, the relevant individuals have not consented to their personal data being disclosed.
 6. As such, disclosure would meet neither the fair nor lawful processing principles. In light of this, this is being withheld under Section 40(2) and 40(3A) FOIA and 13(1) EIR.
 7. Your remaining questions are being responded to in the OGA's ordinary course of business. Your emails of 20 August are being dealt with as ordinary business as you request comments or explanations of policy or legislation, as opposed to asking for specific information *held* by the OGA. This is consistent with the ICO's views on how to deal with correspondence that does not fall within FOI.
 8. We will answer those questions in turn.
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1. *What happened to the produced water that was not reinjected after BRX3 was converted into a re-injector?*
 - i. *For instance, most recent data reported shows the total volume of water produced at Brockham and Lidsey from Dec 2017 to April 2018 reported to the OGA as 190.87 m3, but only 82 m3 was reinjected.*
 2. *OGA database shows no reinjection from July 2012 to March 2018, even though oil and water production continued at both sites until early 2016. In addition, page 30 of the Angus*



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AIM admission document dated Nov 2016 says "In preparation for the surface upgrades at Brockham, the Brockham oil field was shut in on 31 January 2016. This also closed the water injection well requiring the simultaneous shut-in of the Lidsey oil field." This suggests that that water reinjection at Brockham continued from July 2012 to Jan 2016, but this is not reported.

Indeed, the volume of reinjected water reported for the period Jan 2015 to Jan 2016 reported on page 12 of the Waste Management Plan (SLR Ref: 416.07253.00001, Version No.0, May 2017, link:

<https://emea01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fconsult.environment-agency.gov.uk%2Fpsc%2Frh3-7au-angus-energy-weald-basin-no3-ltd-permit%2F&data=02%7C01%7Cfoirequests%40ogauthority.co.uk%7Ca5e09d3b9f784885bea608d606b31fec%7Ce681c59d868e488780face36f1f21b0f%7C0%7C0%7C636703763739048531&sdata=ElshIxoIm2INLdfjfw0IRLjsm01R9No6Gg4a2KBq7w%3D&reserved=0>) submitted to the Environment Agency as part of the re-permitting consultation is 3,254 m3 (while the volume of reported to the OGA for the same period is 0).

Why the discrepancy? Can the OGA verify this data?

9. In response to your questions 1 &2, we are currently examining the returns made by Angus for water production, injection and re-injection and if inaccuracies are found these will be corrected.
3. *What is the process for verifying/auditing the numbers reported to the OGA?*
10. The Petroleum Production reporting system contains a number of consistency checks which highlight errors to the operator as they are entered and will not accept input until these are corrected. In addition, where data mismatches are identified we will examine these with the operator and require changes as necessary.
4. *What is the trajectory of BRX3 (water reinjector), well tops, xyz coordinates and total measured depth?*
11. The BRX3 data is available at the UK Onshore Geophysical Library, UKOGL (click on the link, go to "interactive map full screen", type "Brockham" in the search box, select the X3 well from the list, then you can click on both "depths" and "directional" – which should give you the information you require):
<https://www.google.co.uk/url?sa=t&rct=j&q=&esrc=s&source=web&cd=1&cad=rja&uact=8&ved=2ahUKewjXzeD3vvvdAhVQWBoKHUv0BmkQFjAAegQIABAD&url=https%3A%2F%2Fukoggl.org.uk%2F&usq=AOvVaw0j3RCssH3VjwSBpzAqShWK> This information would be withheld under Section 21 FOI and Regulation 6(1) EIR as it is already in the public domain.



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1. *Is the OGA notified when an operator performs the following injection operations/at what stage is the OGA notified?*
 - a. *Acid wash*
 - b. *Matrix acidisation*
 - c. *Acid fracking*
12. If the operations entail the injection of significant volumes of fluid (whether acid or otherwise) above the fracture pressure then, as indicated in section 7 of our onshore guidance (see paragraph 17 for the link), we would consider the operations to include hydraulic fracturing and a Hydraulic Fracture Plan ('HFP') would be required as part of the application for approval to complete the well. As noted in that section, if the proposed volumes fall below the Department for Business, Energy and Industrial Strategy's (BEIS) associated fracturing thresholds, the OGA may decide that less information or monitoring is appropriate, but an HFP will be required.
13. Acid washes and matrix acidisation and other completion treatments using acid that are not engineered to be above the fracture pressure would not routinely need to be described in the application for approval to complete the well unless we considered them to be of particular significance for the well in question.
14. The Health and Safety Executive (HSE) or Environment Agency may require information from the licensees that we do not have need of.
2. *What information is reported (start/end date, injected volume, injection pressure)*
15. Where completion operations have been covered by a HFP the injected volumes and pressures would be reported. For other operations, information would be reported as part of the routine well or test reporting.
3. *Is this information available to the public?*
16. Detailed well information is normally released at the end of the confidentiality period specified in the licence which can be several years following the operations. For hydraulic fracturing the confidentiality period is shorter at six months.
4. *What is the OGA's definition of matrix acidisation and acid fracking?*
17. We do not have a definition of matrix acidisation or acid fracking however the criteria of section 7 of our onshore guidance (https://www.ogauthority.co.uk/media/4959/29112017_consolidated-onshore-



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[guidance-compendium_vfinal-002.pdf](#)) would apply to fracture operations that used acid as the fracturing fluid.

18. This concludes the OGA's consideration of your request.

Appeals procedure

If you are unhappy with the way the OGA has handled your request, you may request an internal review. A request for an internal review should be made within 40 working days of the date of receipt of the response to your request and should be addressed to:

FOI Manager
Oil and Gas Authority
21 Bloomsbury Street
London
WC1B 3HF
Email: foirequests@ogauthority.co.uk

Please quote the reference number above in any future communications with regard to this request.

If you are unhappy with the outcome of the internal review, you may contact the Information Commissioner at www.ico.org.uk or at Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

Yours sincerely,

FOI Officer