



EPR/YP3623LC/A001



Consultation closes 19th September 2025

Suggested responses to Environmental Permit Consultation

Europa Oil and Gas have submitted an application to the Environment Agency for an Environment Permit which, if approved, will allow them to undertake work at the Burniston Mill site and underground beyond the Rugby Club in Scalby. The application is unusual in that the planning application that is currently before North Yorkshire Council has yet to be determined. Without planning permission, no work can go ahead. We think that Europa Oil and Gas are attempting to hurry the planning and regulation processes along before the moratorium on fracking is extended to all forms of fracking - including the so called 'proppant squeeze.'

These briefing notes have been produced to help those who want to 'do their bit' to try to stop Europa Oil and Gas from drilling for gas at a site within the Heritage Coast and close to the North York Moors National Park. The planning process will determine whether the land can be used for the industrial process of drilling for gas and using hydraulic fracturing to increase gas flow rates but the regulation regime determines how the company should operate.

The permits are for a mining waste operation, mining waste facility and a groundwater discharge activity. If approved, the permits would allow Europa to burn waste gas in a flare, dispose of waste from drilling the well and allow waste fluid from hydraulic fracturing (fracking) to remain underground.

Page 2 of these notes shows a summary of the Environment Agency's consultation and includes those matters that they can take into account and those they cannot. For example - the Environment Agency can take into account the noise and fumes from within the site but not from the traffic going to and from the site (which is a planning consideration.)

Pages 3 and 4 contains some notes to help you to put your thoughts together. These notes are not intended to restrict in any way what you write and how you write it. If you feel strongly about matters that the Environment Agency cannot take into consideration - include it anyway. They may not be able to take it into consideration but they will know your strength of feeling!

How to submit your views

Put the application number into your search engine - EPR/YP3623LC/A001 and you will be taken to the Environment Agency consultation page - shown in summary on page 2. Read through the notes and draft your thoughts before opening the Online Consultation (below.) You can start to fill in your details and comments. If you prefer, you can write your comments separately and attach a document of your comments. If you wish to pause your submission, you will receive an email code allowing you to restart when you are ready to do so. Don't forget that the final date for consultations is 19th September 2025.



Closes 13 Aug 2025

Opened 16 Jul 2025

Contact

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Overview

We can take account of

- Relevant environmental regulatory requirements and technical standards.
- Information on local population and sensitive sites.
- Comments on whether the right process is being used for the activity, for example whether the technology is the right one.
- The shape and use of the land around the site in terms of its potential impact, whether that impact is acceptable and what pollution control or abatement may be required.

- The impact of noise and odour from traffic on site.
- Permit conditions by providing information that we have not been made aware of in the application, or by correcting incorrect information in the application (e.g. monitoring and techniques to control pollution).

We cannot take account of

- Issues beyond those in the relevant environmental regulations.
- Anything outside the remit of the EPR, e.g. the proposed location of the site, which is done by the local authority via land use planning.
- Whether a site should have a formal designation under Habitats Directive or other conservation legislation.
- Whether the activity should be allowed or not as a matter of principle. For example we will not consider whether wood, gas, or coal should be burnt to produce electricity; only that the options and environmental impact of say wood has been considered. We will not consider whether a waste incinerator proposal should be turned into a sorting and recycle proposal, only that the incinerator options and effect have been considered.

<p>1. General Points</p>	<ol style="list-style-type: none"> 1. Planning Application NY/2025/0030/ENV has not yet been determined by NYC. 2. The Environmental Permit application is premature and should not be determined until after the planning decision is made. 3. UK Government policy is to move away from fossil fuels towards sustainable energy sources. 4. Global warming/heating is a clear and present danger to human health. 5. "Proppant squeeze" is a form of hydraulic fracturing - also known as fracking see Legal Opinion submitted by Estelle Dehon KC 26 June 2025 and shown in the online representations of North Yorkshire Council Planning Portal NY/2025/0030/ENV - 250626 Advice accompanying FOE letter redacted.
<p>2. Relevant environmental regulatory requirements and technical standards</p>	<ol style="list-style-type: none"> 1. The Waste Management Plan (page 18) Phase 2 - Drilling Operation describes the drilling of an appraisal borehole but does detail all of the the chemical compositions of the drilling 'muds.' (Page 12) 2. The drilling phase penetrates groundwater at various levels but there is no separation between the drilling 'muds' and groundwater or aquifers. The drilling plan (Phase 2 - pg 18) states that the production casing will be installed in the borehole "if natural gas is encountered and is considered suitable for further testing." What separates the drilling muds, fluids and wastes from the aquifers? 3. There are real concerns about the lack of detailed geological information concerning the known and unknown fault systems and the potential effects upon aquifers and water supplies. Peak Fault and other local faults are known but their extent underground is unknown. In the absence of a detailed 3D seismic survey the presence of unknown faults are uncertain. Even with a 3D seismic survey there will still be uncertainty about fault location and earthquakes can be triggered by injecting fracking fluids into these unknown faults. (see BGS - Earthquakes induced by Hydraulic Fracturing Operations near Blackpool, UK) 4. Earthquakes were caused by much smaller volumes of fracking fluid than Europa plans to use at Burniston (Cloughton 2) See Drill or Drop 27 September 2024 - Burniston drilling meeting. 5. This EPA should not be determined until after a full 3D seismic survey has been completed and has been independently assessed by both the BGS (British Geological Survey) and university geological departments.

3. Information on local population and sensitive sites.	<ol style="list-style-type: none"> 1. The nearest home is immediately adjacent to the site entrance - Wayside Farm. 2. The application site should be considered as including the access road from Coastal Road to the well drill site. 3. Other nearby homes that will be impacted by noise, pollution and site activity - including 24/7 activity are on Coastal Road, Hawthorne Close and Bridge Close. 4. We are not convinced that the processes and mitigations are sufficient to prevent physical and mental harm to local populations.
4. Comments on whether the right process is being used for the activity, for example whether the technology is the right one.	<ol style="list-style-type: none"> 1. This is the wrong process on the wrong site which cannot be mitigated whatever technology is used. 2. "Proppant squeeze" is a form of hydraulic fracturing - also known as fracking see Legal Opinion submitted by Estelle Dehon KC 26 June 2025 and shown in the online representations of North Yorkshire Council Planning Portal NY/2025/0030/ENV - 250626 Advice accompanying FOE letter redacted.
5. The shape and use of the land around the site in terms of its potential impact, whether that impact is acceptable and what pollution control or abatement may be required.	<ol style="list-style-type: none"> 1. The surrounding agricultural land produces a variety of crops and there is concern that the escape of combustion products and fumes throughout the life of the well site will impact upon the soils. 2. The access to the well site passes immediately next to Wayside Farm and nearby homes and should be considered as part of the Environmental Permit application site.
6. The impact of noise and odour from traffic on site.	<ol style="list-style-type: none"> 1. The nearest home is immediately adjacent to the entrance to the site on Coastal Road. The people who live there will be directly affected by the movement of traffic to and from the site - as will homes nearby on Coastal Road, Hawthorne Close and Bridge Close. 2. It is not just traffic on site that is a cause for concern but the machinery involved with the various processes that will also emit noise and fumes. 3. We are not convinced that the site activities will not impact upon the lives of local people.

Consultation closes 19th September

The Environment Agency are holding a public 'drop-in' at Burniston Village Hall on Wednesday 3rd September 2025 from 12 - 4pm. It's your opportunity to ask questions before submitting your comments.