Written evidence from Singleton Forest Watch (MET0046)

Overview

This submission has been prepared by the King's College Legal Clinic[1] on behalf of the Singleton Forest Watch ('SFW'), a group of concerned citizens from local communities surrounding the Singleton oilfield. The village of Singleton (and the oilfield) is in the heart of the South Downs National Park. It lies five miles north of Chichester in the picturesque Lavant valley, West Sussex. SFW is affiliated to the Weald Action Group ('WAG') which consists of a number of communities affected by oilfields around southern England. WAG broadly supports the recommendations in this submission.

The aim of the submission is to provide a case-study of a particular example of an oilfield (leaking and flaring methane gas). In so doing we aim to support the generic recommendations for improved monitoring and regulation, and a ban on routine flaring. We wish to stress that our demands for the site during the lifetime of its current permit are focussed on avoiding and ending methane leaks, venting, and routine flaring, rather than simply ending production.

We have had sight of the detailed submissions by the Clean Air Taskforce ('CATF') to this Inquiry, which we wish to adopt in relation to the aspects relating to methane emissions from onshore oil fields and related recommendations. We previously secured a monitoring visit by CATF to the Singleton oilfield, and they identified methane leaks from the site (see below). This experience directly informs the below submissions.

As one of 155 countries signatory to the Methane Pledge, the UK has agreed to take voluntary actions to reduce global methane emissions by 30 percent compared to 2020 levels by 2030. According to the IEA, the oil & gas industry can achieve a 75% reduction in methane emissions with current technologies, and up to 70% at no net cost. A small number of sites and pieces of equipment are often responsible for a disproportionately large amount of methane emissions. Our research on and experience of onshore oil and gas sites in the UK such as Singleton has shown that in this and other cases the environmental permit allows "unlimited amounts of methane to be vented" and other gases to be discharged into the atmosphere without any restriction. We have also found that fees for non-compliance are lower than for mitigation which leaves little incentive for polluters to fix the problems. Finally, we know that many historic,

[1] King's Legal Clinic (KCL), operating through King's College London is a free legal advice clinic where Phd, postgraduate and undergraduate law students conduct research under the supervision of qualified lawyers and academics representing local organizations and individuals who cannot otherwise finance legal advice. The Human Rights and Environmental Law Clinic has particular expertise in relation to the intersection of human rights and environmental law. It has worked with SFW since 2023 and has visited the Singleton site.

low producing wells operate with the following flaws, some of which apply at Singleton and similar long-standing on-shore oilfields:

- Malfunctioning flares
- Venting
- Emissions Other sources (Tanks, vents, valves)
- Intentional and unintentional releases of gas (separator tanks).
- Midstream operations and flaring malfunctioning, or completely unlit-venting methane directly into the atmosphere.

A drop in the overall amount of flaring, therefore, could significantly reduce emissions.

Case Study: The Singleton Oil Field

Singleton Oilfield which is 1.5 miles from the village of Singleton, is set in a very rural area or rolling hills and woodland north of Chichester. It was first drilled in 1988 and began oil production in 1990. The site was taken over by IGas from Providence Resources in 2013. It was IGas's (now STAR Energy) second most productive site in 2018, the most recent year for which full figures are available. Singleton is a village in Chichester near the source of the River Lavant, one of Britain's precious chalk streams. It is on the north slopes of the Trundle and near Goodwood Racecourse. Surprisingly, Singleton is just one of 10 producing wells in the area, not known for its oil-production.

The site has six extracting wells, two flare stacks, one vent, an oil heater, and a power generator. Given the age of the installation, there is considerable scope for these installations and the surrounding pipes to leak. The EA issued a permit to STAR Energy in 2021 (EPR/AP3237YS/V002) that allows unlimited emissions of methane in 'ground flaring' and 'production gas through vent stack.' One of the concerns of the SFW is that we were not even aware that the permit had been applied for. We became aware of this later, too late to challenge its terms. In order to comply with the Aarhus Convention's aims of public participation and transparency in the environmental context, we consider that reforms are needed to provide clear advance information to local communities such as ours on plans relating to oilfields, as well as regular published monitoring information. Our community should have been consulted on the permit conditions.

To obtain information, we have had to make 'Freedom of Information Act Requests'[2] to the Environment Agency. This is difficult as the information received is technical. Even knowing what to ask requires some technical or legal knowledge. We have received information that in 2022, Singleton flared 4,903 ksm3, slightly down on 2021 but higher than the totals in both 2019 and 2020.[3]

[2] SSD339230
[3] NSTA

It has been reported that Singleton has flared more gas than any other onshore field in each of the years that records were published, see

https://drillordrop.com/2023/03/09/offshore-flaring-halves-in-four-years-but-onshore-hits-record-high/

The community has made numerous FOIA requests and more recently made requests with the help of the Legal Clinic (we could provide copies or a summary). The latest response confirms that the site has continued to routinely flare methane every month from July 2023 to December 2023. The recent reports quote around 2 m3 of methane being released every month which if carried on for the whole year would be 12 tonnes. However this is significantly lower than earlier reports so may relate to one vent rather than the whole site (and underlines the complexity of the information). Also, athough the amounts recorded may be small in the grand total of UK emissions but it is a not a true reflection of the sites actual emission releases. The Clean Air Task Force in 2021 and 2022 through a FLIR camera captured fugitive emissions being released from the site through the settlement separator tanks. We are in the process of organizing a further visit with CAFT at Singleton on the **24th of April 2024** and anticipate there may be similar findings. Moreover, the FOI reports while indicating routine flaring, also do not give a full picture of the methane emissions being released from the site as the CATF has shown through the videoing of fugitive emissions. Further, if every site around the UK is releasing similar amounts of such a harmful substance this is significant. As a community concerned about climate change, this appears to be wasteful when the gas could be transported off site and used productively for energy.

Routine flaring has decreased significantly for offshore oil rigs but recently it has increased for onshore oil fields. More than half of this onshore flaring has occurred at Singleton: in 2022 Singleton flared 6,200 m3 which is 2970.[4] Flaring, such as occurs at Singleton during oil and gas operations not only releases large amounts of air pollutants such as methane, but is a major economic loss. The IEA has shown that oil and gas operators in the UK can waste 72% less methane by tackling methane leaks, venting and flaring, with existing technologies, much of which would be profitable actions for companies. This would cut UK methane emissions by 9%. We would urge the Inquiry to recommend a ban on routing venting and flaring as proposed by the North Sea Transition Authority which expects industry to adhere to zero routine venting and flaring by 2030. Parliamentarians are currently considering codifying the UK's pledge to zero routine venting and flaring by 2030 as part of the Offshore Petroleum Licensing Bill. The UK could also seek to implement the U.S. Methane Standards for the Oil and Gas Sector which, as of 2024, prohibits any new or modified wells from flaring associated gas after a two-year phase in (2026). Those rules also prohibit existing wells from such flaring unless the operator demonstrates a technical infeasibility that requires it.

[4] https://drillordrop.com/2023/03/09/offshore-flaring-halves-in-four-years-but-onshore-hits-record-high/

Recommendations for the government

As a starting point the UK should consider its commitments under the Methane Pledge and incorporate these in domestic law, after hosting and facilitating the launch of the Global Methane Pledge at COP26. The UK can leverage its position in multilateral fora such as the G7 and G20 to encourage action on methane, as well as further public and philanthropic contributions. Furthermore, the UK should increase international engagement in and public financing of programmes (like the Climate and Clean Air Coalition and the International Methane Emissions Observatory) to reduce methane emissions.

The UK does not currently have any legally binding targets in place for methane emission reductions. Methane is currently included within the UK's Carbon Budgets and Nationally Determined Contribution (NDC), rather than as an independent separate methane target. To incentivise specific action to tackle methane, the UK should set a separate target for methane in its updated NDC, which is due to be submitted to the United Nations Framework Convention on Climate Change (UNFCCC) next year. By doing so, it would accelerate the reduction of the UK's methane emissions, which are estimated by the UK government to be 52 megatonnes CO_2e in 2020.

Access to information and consultation

- The Environment Agency should publish quarterly reports on all on-shore oilfields in an accessible format
- Communities should be informed of any application to amend or extend existing permits and adequately consulted

Flaring

- Develop and implement ban on routine venting and flaring and enshrine in law
- Seek to enhance oversight and transparency of emissions around flaring
- Codifying the UK's pledge to zero routine flaring by 2030 as part of the Offshore Petroleum Licensing Bill.

Data Measurement and Monitoring

- Standardise measurement-based monitoring, reporting and verification (MMRV) for onshore oil and gas facilities.
- More frequent quarterly LDAR inspections on upstream oil and gas installations

- Establish clear targets and timelines of methane emissions reductions
- Update current methane reporting programs for oil and gas facilities with empirical data
- Publish a public inventory of emissions from venting
- More regular announced and unannounced inspections of oilfield
- Faster repair for leaks—quickly identify and repair within 15 days of inspection.☐Fugitive monitoring continues for all well sites until the site has been closed, including plugging the wells at the site and submitting a well closure report.
- Create an integrated methane emission management platform (software) to ensure a transparent, auditable and manageable Methane Emission programme
- Commit specific financing to facilitate and implement methane mitigation measures.

Regulation

- Improve existing rules and regulations on methane emissions in the oil and gas industry, particularly in the area of reducing fugitive emissions.
- Align guidance, regulation and legislation for onshore oil and gas with offshore NSTA
- Vapor recovery or flaring rather than venting
- Invest in research that seeks to improve the emission detection limits for satellite instruments and to develop capabilities to resolve the spatial structure and isotopic composition of methane.
- Assess social costs of methane emissions and consider actions to mitigate these impacts**.**

Planning

- The need for full climate impacts of new fossil fuel developments should be taken into account in the environmental impact assessment when planning applications are considered, including downstream GHG (methane and other VOCs) emissions.

Conclusion

The information above is to be read as an addition to the Clean Air Task Force submission. We believe that implementing these changes will drastically reduce methane emissions in the UK from onshore Oil and Gas producing fields like the one in Singleton.

We welcome the Committee’s interest in this concerning issue.