

To Peter Ashcroft, Development Control, ERYC, County Hall, Beverley. HU17 9BA

Tuesday 10th February 2014

Dear Mr.Ashcroft,

**Objections to Planning Application by Rathlin Energy UK Ltd, West Newton B Well Site
Crook Lane, West Newton**

As a Beverley resident and as someone born in the East Riding of Yorkshire I write to object to Rathlin Energy being granted further permission to drill a third well at 'West Newton B'. I object on the grounds that Rathlin have failed to demonstrate either transparency or honesty in regard to consultation with the community. We have been presented with half-truths and obfuscations both in terms of Rathlin's strategic plans for petroleum production in the East Riding and also in regard to the reality of events during their testing programme at West Newton A during the summer and autumn of 2014. This lack of open and democratic consultation carries grave consequences for the whole population if Planning Applications are granted and production eventually begins.

A Lack of Transparency and Honesty in Consulting Communities

Rathlin continue to deny that they intend to use unconventional, high volume, hydraulic fracturing or fracking in order to produce shale gas. Despite this assertion, Rathlin were part of the Coalition Government's drive to 'Go all out for shale'. They hold a licence (PEDL 183) which permits them to explore for shale gas and unsurprisingly, they have indeed drilled down to the Bowland Shale. Indeed, not *just* to the Bowland Shale but even deeper to the Dinitian Carbonate formation below. I am not an oil expert, but common sense tells me that if you apply for a licence that includes the permission to explore for shale gas and then go to the huge expense of drilling far beyond conventional formations and shale gas is found in viable quantities, sooner or later 'someone' will wish to produce shale gas by fracking. The rest is semantics.

Rathlin have presented their stay here in the East Riding at Crawberry Hill and West Newton A as being temporary only. Their use of the word 'temporary' litters their first Applications and similarly, crops up repeatedly in reports to ERYC Planning Committee. The mantra is *exploration and restoration*. Yet we have subsequently learnt that this is far from the truth, when it was revealed in the High Court last year that Rathlin's 'temporary' current exploration is linked to 50 year options on leasing the land to produce oil and gas at both sites. Do we then conclude that Rathlin received these permissions on the grounds that exploration was 'temporary' - and where does this leave the concept of 'Restoration and Aftercare'?

As a result of close scrutiny of the supporting document for Rathlin's latest application we have become aware that a pre-application enquiry for two exploration boreholes at West Newton B had already been made on 25 April 2014 prior to activity recommencing at Crawberry Hill and West Newton A in May 2014. ERYC responded to this before well testing started at West Newton A in July 2014. In contrast to the local mythology that the two existing wells are the extent of development, a picture begins to emerge of the East Riding

dotted with drill pads, reminiscent of aerial photographs of Buffalo, Colorado. Clearly, the question that arises is how many more wells are planned for the East Riding?

A BGS/DECC Bowland Shale Gas Study estimated the total shale gas in place under an area of central England including the Cleveland Basin in Yorkshire could total 1329 trillion cubic feet. If 4 percent of this gas is recoverable it would require around 50,000 fracking wells... Shale gas wells are usually drilled at a density of up to 8wells per square mile....

The prospect is nightmarish.

Through a web of half-truths and empty reassurances, the community are being encouraged to believe that no hydraulic, high volume, unconventional fracking will take place in the East Riding: that there will be a few well pads extracting conventional oil but this will be temporary and that the landscape will be restored after exploration ends. The truth is that although Rathlin Energy may not be fracking – *just now* – if the right conditions are realised and it certainly looks like they might be, then ‘someone’ will hydraulically frack later – and with leases for up to fifty years, begin production that will eventually turn East Yorkshire and the rest of this overcrowded island into a gas field on an industrial, American/Australian scale.

My first objection is that Rathlin have not shared all information about their strategic planning. The precautionary principle requires that no decision is taken on West Newton B until the full extent of Rathlin’s exploration plans are published and consultation can take place; the West Newton B application can only be considered if it is placed in context.

I was at the Planning Committee meeting on 2 October 2014 where Rathlin was granted its eighteen month extension at Crawberry Hill, when a member of the committee asked if Rathlin had done anything wrong. The answer from the Planning Officer came back categorically ‘No’. I think this will come back to haunt ERYC if Planning Applications continue to be granted with insufficient diligence to ensure that all relevant information is placed before the public and Elected Members.

Environmental and Safety breaches by Rathlin at West Newton A . July – October 2014

In Rathlin Energy’s latest Planning Statement they say, ‘**The Applicant is committed to safe, compliant and environmentally conscious operations for the benefit of employees, contractors, shareholders, stakeholders and the communities in which the Company works.**’

Rumours of incompetence, bad practice and breaches of regulations surrounded the activities of Rathlin Energy at West Newton A during their exploratory drilling last year. Speculation has subsequently been corroborated by analysis of email correspondence between Rathlin and the Environment Agency, revealed under a Freedom of Information request. See DrillOrDrop.com Investigation: What went wrong at West Newton?

This document catalogues a series of breaches of regulations and permit conditions, denials, counter accusations, delays, deadlines missed, deficiencies in record-keeping and record keeping of hazardous materials, flare-temperature not adequately monitored and logged,

equipment problems and Health and Safety investigations of a complaint of an employee working at height without necessary equipment.

Had ERYC acted on a letter signed by me and several other residents directed to Alan Menzies in August 2014, there would have been close liaison between ERYC, the Environment Agency and the HSE, and these serious breaches of regulations, permits and planning permission would have been in the public domain soon after they occurred, rather than several months later.

My second objection is that Rathlin has clearly not been “compliant” and “safe”. A precautionary approach means ERYC cannot support further activity by Rathlin until the Director responsible for Development Control reports on a more robust system to ensure that regular inspections of Rathlin’s activity take place and all information about complaints and breaches of regulations are shared and made public when they occur.

Please do not hesitate to contact me if you require further evidence to support these objections.

Yours sincerely,
Val Mager