

EBBERSTON MOOR SOUTH PLANNING APPLICATION – HOW TO OBJECT

What's the planning application about?

Third Energy UK Gas Limited and Moorland Energy Ltd have applied for:

- natural gas production and water re-injection at the existing borehole at Ebberston Moor South
- the construction and drilling of a second borehole for water production and re-injection
- the construction of a 13.9 km long underground pipeline to the Knapton Generating Station
- installation of a new gas reception module at the Generating Station

Is this an application to start fracking?

No, it isn't. The companies say in their covering letter that "the proposed development does not involve drilling into shales", and we acknowledge that they are not currently asking for permission to frack. The application is for conventional gas production, and they are planning to extract 571 million m³ of gas over a 25-year period. This gas would be extracted from a layer of rock known as the Kirkham Abbey Formation (or KAF), which is where most of the conventional gas in Ryedale comes from.

So if this is conventional gas production, why should we be worried?

The main cause for concern is the re-injection wells. Third Energy are asking for permission to drill a new borehole to re-inject the waste – or produced – water, which comes up with the liquid gas, back in to the layer of rock that lies above the KAF, called the Sherwood Sandstone Aquifer. The company wants to re-inject up to 10.4 million cubic metres of radioactive water back into the Sherwood Sandstone layer over a 15-year period, or 1,900 m³ a day. This is equivalent to 4,160 Olympic-sized swimming pools.

OK, that doesn't sound good. What else are you worried about?

Well, it's a National Park, for a start. Shouldn't they be protected from development? There are also concerns about the effect on wildlife, particularly during the 3-month drilling phase, where the drills will be going 24/7. The site is very near Dalby Forest and next to the Moors to Sea Cycle Network. There are also concerns about the pipeline damaging the archaeological heritage of the area.

So how can I object to this?

Please write two letters, one to the North York Moors National Park Authority and one to the North Yorkshire County Council. (The application has been registered with both authorities as the work would occur in both areas of jurisdiction). Here are the addresses:

Director of Planning
Planning Department
North York Moors National Park Authority
The Old Vicarage
Bondgate
Helmsley YO62 5BP
Reference: **NYM/2014/0587/EIA**

Chief Planning Officer
Planning Services
North Yorkshire County Council
County Hall
Northallerton
DL7 8AH
Reference: **NY/2014/0275/ENV**

Please quote the Planning Application reference number in **red** in your letter.

The closing date for objections is **24th October 2014**.

For ideas of what you can say in your objection, please **turn over**.

You can also go to our website and download customisable letters, which you can then print out and post.
www.frackfreeryedale.org/ebberston-moor-south-how-to-object

What you can say in your objection

Please begin your letter with a short paragraph saying that you would like to object to Third Energy's application in the North York Moors National Park. If you are writing as an individual, please don't say that you're responding on behalf of Frack Free Ryedale, as we will be putting in our own objection separately. If you are responding on behalf of an organisation (Parish Council, local business, etc.) then please state this in the first paragraph too. You can also mention that you are a frequent visitor of the North York Moors National Park.

In the main body of your objection, please make some of the following points:

- the proposed re-injection wells pass through aquifers that supply local drinking water. If and when the well casings fail, radioactive waste water could pass into the water supply.
- Ebberston South is located within various protection zones of the Corallian Limestone aquifer, and Yorkshire Water have already stated that the re-injection wells might 'directly affect their asset'.
- There is no proposed treatment process for the waste water before it is re-injected into the ground, which again does not constitute the best available environmental option.
- Studies in the USA indicate that waste water re-injection is a major cause of seismic activity, and is thought to be responsible for an exponential increase of earthquakes in Oklahoma.
- The National Park should not be used as a testing ground for potentially dangerous new procedures if there is any chance these might cause water pollution or earthquakes in the area.
- Third Energy cannot be 100% certain that waste water won't travel into nearby aquifers over time, particularly after such a huge amount of water has been injected into the Sherwood Sandstone.
- The company's argument that 'the natural geology controls risk' is unproven. Third Energy's consultants, Barton Willimore, state that 'drilling in the Ebberston area is more difficult than in many other areas due to faulting and associated extensively fractured rocks'.
- The company argues that the re-injected waste water can't migrate laterally due to 'significant geological faulting', while at the same time claiming that re-injected waste water can't migrate upwards due to a layer of impermeable rock. These two positions are clearly contradictory.
- The Environment Agency have failed to conduct any independent analysis of the geology or water composition in the area, and are simply relying on data presented to them by the applicant.
- Waste water re-injection into an existing aquifer is untested on the UK mainland. Given the untested nature of this technology, the precautionary principle should be applied and no waste water re-injection wells should be allowed in a National Park.
- Allowing a re-injection well in such a sensitive area could set a precedent for further re-injection wells in the park, which may be used to dispose of toxic waste water from fracking in the future.

You can also include some of these points about other aspects of the application

- The drilling of the proposed wells will continue for 24 hours a day, 7 days a week for three months, This will create constant noise and light pollution and have a very damaging effect on wildlife, in particular birds, bats, badgers and other nocturnal creatures, which may be in contravention of the Wildlife and Countryside Act 1981.
- These works are in close proximity to Dalby Forest, one of the main tourist attractions in the National Park. The increase in traffic, noise and general disruption, particularly during the construction phase of the project, will have a damaging effect on tourism in the area.
- The application also requires moving a public footpath, which is part of the popular Moors to Sea Cycle Network, again adversely affecting tourism in the area.
- The pipeline is to be built in the same area as an archaeologically important earthwork remains of the prehistoric period, and these have not yet been adequately researched or documented.
- The pipeline to Knapton crosses the River Derwent, which contains otters and water voles, both of which are protected species.

Please finish your objection with a short sentence asking them to reject the application. Then sign the letters and pop them in the post! Don't forget, you need to make your objections by 24th October.