

**Report on a meeting of the BPC Oil Exploration Working Group
with Chris Wick, Paul Batty and Phil Fahey of the Environment Agency on 1st August 2013**

Permit for Mining Waste Management

This permit was required before drilling of the exploratory borehole could commence, and covers the storage and removal of waste liquids, drill cuttings and waste gases from the site. It also covers scrutiny of all chemicals intended to be employed in drilling and testing the well to ensure that none would be hazardous to the ground or surface water. In consequence some additives that Cuadrilla had proposed were rejected by the EA due to a lack of adequate information. The EA had approved Cuadrilla's proposed use of drilling mud with water based additives, rather than the alternative oil based additives.

Statutory and public consultation on this application ended on 16th July, and the permit was issued to Cuadrilla on 24th July. The EA considers that, with the well established techniques set out in Cuadrilla's Method Statement, the proposed activities present very low risks of water or air pollution.

In the public consultation 876 responses were received. Each response was analysed and the concerns expressed in it were added to a spread sheet. Each concern is considered on a scientific basis. Most concerns had already been considered by the EA. Only any new concerns expressed in a response, perhaps as a result of local knowledge, had then to be considered. In consequence, having considered all concerns, the EA was able to meet its targets of providing a draft determination of the application within 4 working days and a final determination within 6 working days. Many concerns expressed by respondents related to fracking and were not relevant to the consideration of this application.

An explanation behind the mining waste permit is available in the 'Decision Document' which can be accessed via the Environment Agency's web site www.environment-agency.gov.uk/balcombe.

Permit under the Radioactive Substances Regulations

These Regulations cover the keep and use of radioactive material and the accumulation and disposal of radioactive waste. Other enterprises that may generate radioactive waste include hospitals, universities, industrial applications and other NORM industrial activities such as china clay mining and titanium dioxide extraction. It is considered possible that the proposed activities at Lower Stumble could generate waste containing NORM (Naturally Occurring Radioactive Material). There is a possibility that this waste will be within the scope of the Regulations. Cuadrilla has applied for a permit before stimulating the exploratory well at Lower Stumble.

The presence of NORM in the produced water arising from the well stimulation will be monitored by an independent analyst and, if levels of radiation covered by the Regulations are detected, the water must be sent for processing at one of the two sites that have the appropriate licence to receive radioactive waste. Otherwise the produced water can be disposed of at sites that do not need a licence to receive radioactive waste. At present Cuadrilla has the capacity to store up to 180 cubic metres of produced water on site, more than the total that is expected as a result of the well stimulation. This on-site capacity could be increased to 240 cubic meters.

At present statutory and public consultation on this application will end on 13th August

Public Meeting with the EA

In principle the EA is happy to attend a public meeting in Balcombe at which its representatives would give a presentation on the role and procedures of the EA, and answer questions from the floor.

It is suggested that an appropriate time might be in October, after Cuadrilla's current activities at Lower Stumble have been completed and before it announces whether or not it intends to seek the necessary approvals for extraction.

An independent chairman would be required for such a meeting, and BPC will give consideration as to who it might be appropriate to invite to fill this role.

The meeting would be intended primarily for Balcombe residents and BPC will consider how ticketing can be used to ensure that this intention is achieved.

Interim Pre-Drill Environmental Monitoring Report

This report, produced for Cuadrilla by Ground-Gas Solutions Ltd. sets out pre-drilling data on water and air quality.

While the EA usually relies on audits of data gathered by contractors, in this instance it collected water samples at the same places and at the same times, and these are being analysed. The EA has not taken base line air samples because it believes that the analysis of these would be of little scientific value. Generic evidence and the experience from other sites where flaring takes place, including those elsewhere in Sussex, suggests that there is little if any cause for concern. However the EA acknowledges that air quality is a concern to a significant number of members of the public and is considering how best to address this concern.

Other Matters

The role of the EA is set out in the document entitled “Frequently Asked Questions” which the EA published in July. Despite Government “cuts” its ability to discharge its responsibilities in respect Cuadrilla’s activities at Lower Stumble has not been hampered by lack of resources.

Lower Stumble is a test case for all concerned. The current regulations governing hydrocarbon exploration in general, and fracking in particular, are somewhat piecemeal and rationalisation of the permitting processes whilst maintaining robust and effective environmental safeguards would be desirable.

Cuadrilla’s future intentions are unknown, but fracking is not permitted under the current permit. The Health & Safety Executive will be monitoring pressures and seismic activity and, in the event that any fracturing is detected, this will be reported with consequences for Cuadrilla.