

**Frack Free Balcombe Residents Association
(FFBRA) Objection to
Angus Energy's application to pump out water and
conduct an extended well test
at Lower Stumble, Balcombe**



12 November 2019

The Balcombe community has voted three times against the presence of the oil and gas industry in our village.

In responding to this consultation, we are obliged to object to specific aspects of the application that are material to planning. But our first, fundamental and overriding objection is to the presence of this company or any other oil company in our village. Whatever the conditions and whatever they claim to be doing, we do not want them here.

It is the job of our elected councillors to listen to our views.

Liaison between Angus Energy and the village has not been good. There have been no open meetings. Insufficient notice has been given of Community Liaison Group meetings, and on occasion influential organisations such as the Environment Agency have not been invited until the day of the meeting. At the last meeting there was no representative from the Environment Agency (because of late notice, less than 24 hours) and no representative of either County or District Councils, and no representative of the planning department. The lives of

people in this village are about to be disrupted yet again, and it is important that these organisations send representatives, and listen to what both sides have to say.

Angus Energy people attending these meetings are frequently unable to answer technical questions. Meetings sometimes end very early, half way through the allotted time, even though some FFBRA members have by then not asked all their questions, after spending many hours preparing for the meeting.

Angus Energy agreed to share monitoring data from their previous activities with the village. They have not done so.

FFBRA believes that Angus Energy are trying to get planning permission for *production* in the guise of an extended well test.

Extended well tests are typically much shorter than 1,095 days (three years). In this region, 75 or fewer days seems typical for an extended well test.

If Angus Energy succeed in pumping out the water from the well, they should be able to see whether oil will flow, or at least after a brief well test. They should then be required to re-apply for permission to produce.

If Angus Energy applied for *production*, they would need to apply to the Environments Agency (EA) for a groundwater permit, a development permit and a more detailed risk assessment, to the Oil and Gas Authority (OGA) for a field development plan and a production consent, plus other regulatory approvals from WSCC and the Health and Safety Executive. During production they would not be allowed to flare, because it would no longer be Best Available Technique (BAT) and they would have to transport the gas away from the site for use, which would be expensive (*see below*). Those are headaches and expenses that Angus Energy would presumably like to avoid, at least for a year or three. Angus Energy's

managing director has expressed delight that the extended well test will 'pay for itself' in the oil produced. We rest our case.

If Angus Energy obtain the planning permission they are seeking, they should be aware that they will need to apply for a variation to their environmental permit.

They will need a new waste plan and a new environmental management permit to account for the difference between last time's seven-day test and the 1,095 days they are asking for this time.

FFBRA believes the site is bigger than 1ha, and therefore needs an Environmental Impact Assessment (EIA).

FFBRA members have measured the site. The site plan within this application includes the access road. Fenced site + access road measure more than 1 hectare.

Additional heavy traffic through our village has been underestimated and is based on incorrect data. Traffic volumes need to be reassessed. It is too much. The traffic changed the character of our village.

The projected percentage increases in traffic used in this application are based on a traffic survey done in 2012 on the northern part of London Road, north of the mini roundabout where Haywards Heath Road (B2036) and London Road merge. Northbound, this part of London Road carries the traffic joining from both roads, while in normal times, traffic arriving from the north forks left and right at the roundabout. The school and many houses lie to the south of this roundabout, on a normally quieter stretch of the London Road, which then continues down towards the oil site.

Throughout the time Angus Energy last attempted to flow test in Balcombe, 30 community members organised a Traffic Watch Group, logging traffic movements and HGV types. Site traffic way exceeded the

levels predicted. The Traffic Watch Group estimated the increase in traffic at 15 per cent (as opposed to the predicted 8 per cent), with a 30 per cent increase on the heaviest days. The traffic estimates were further misleading because small lorries were lumped in (by Angus' consultants and WSCC) to the 'HGV' category along with massive six- and seven-axle lorries.

Lorries were seen swathed in branches wrenched down from the trees as they passed. Some vehicles were extremely high, making it difficult to pass under the low-slung power cables that cross over the London Road – Balcombe's electricity is supplied via overhead cables. This was dangerous, as was the fact that long vehicles had to swing out onto the opposing carriageway in order to turn into the oil site, on a road with a 60mph speed limit and a bend just after the site. The B2036 is not made for such vehicles.

Angus Energy admitted that when last here they had chosen not to erect signs to direct lorries to the site so as not to attract protesters. The result was that many lorries got lost, missed the site, and had to circle back round onto the M23 to come through the village again from the north, as specified in the planning permission. Angus have promised to do better next time, providing signage and a banksman to direct traffic.

If WSCC grants this new permission, it would relieve a little of the stress on the village if 'lost lorries' could be allowed to enter the site from the south.

We must also consider the contents of these vehicles passing our school and houses: oil, potentially gases, contaminated water, acids and other chemicals.

There would be noise from the flare and other site equipment.

Angus Energy should be required to erect noise-baffling barriers from the start of operations, not waiting until the community is driven to complain.

The bund proposed is inadequate for a three-year operation, whether that operation is dubbed an ‘extended flow test’ or ‘production’. Descriptions of the bund and drainage arrangements in the application are waffly and inconsistent in different part of the application and reports. As far as we can tell, the bund appears to be inadequate. The planning department should visit the site. Angus energy should be required to construct a bund and drainage to a much higher specification.

The Balcombe community faces air pollution from the flare, generators, tanks and site operations in general.

The village lies downwind from the site, at the height of the top of the flare, and the lie of the land carries pollution from the site into the village centre. The B2036 country road runs alongside the site, and the London to Brighton railway line crosses an embankment to the rear. Ancient woodland adjoining the site is home to bats and other wildlife.

The dilemma facing Angus Energy is what to do with the ‘associated gases’, the gases that are produced with or dissolved in the oil, but are not the prime target, more of a nuisance than an asset. They can be vented to the atmosphere, burnt in a flare, or burnt to make electricity. Fearing air pollution, FFBRA is unhappy with *any* of these activities taking place on the site and is also unhappy to have tanker-loads of gas routinely passing our houses and the school to be cleaned and used elsewhere. The Best Available Technique, however, is to recover the gas and send it away.

Details of the flare to be used are sketchy. Members of FFBRA work or have worked in this field. The flare is of particular concern in terms of air pollution, toxins, smoke and particulates, especially if the flare operates at sub-optimal efficiency. Sulphur- and chlorine-containing compounds, including dioxins, are very likely to be present. Sulphur compounds were noted at the site by Conoco in the 1980s. Angus energy intend to use hydrochloric acid in the well, potentially leading to chlorinated hydrocarbons in the waste gases. Experts in the village calculate that levels of polyaromatic hydrocarbons in the air at Kemp’s

Farm could be 24 times the National Air Quality Objective. There could be serious health implications for people in the village, including cancers.

We are also concerned about arrangements for dealing with associated gases in storage tanks. Schedule 3 of the 2018 EA permit (EPR/GB3609KQ) requires monitoring of the gas vented from the storage tank vent. From the application we cannot tell that there is a tank vapour recovery system. Are these dirty gases to be vented? The vapour recovery system that they have is to recover vapours displaced from the tanker when oil is loaded into it, in order to comply with the Sector Guidance requirement to ‘capture and recover all hydrocarbon vapours arising from the loading and unloading of liquid hydrocarbons into vehicles.’ WSCC should ask for a copy of the written plan submitted to the EA for vapour recovery under pre-operational condition PO5 of the 2018 permit.

Angus Energy’s consultants are wrong to downplay the significance of emissions as ‘negligible’ and to say that emissions do not need to be mitigated.

The RSK air dispersal modelling should not have been approved by the EA, according to experts in Balcombe, because it does not address many important toxins.

Based on the smells observed by members of the community during the 2018 flow test, FFBRA believes that odour should be addressed in this planning application. RSK declare that odour and dust are ‘typically minimal’ in this kind of operation, and that ‘given the closest residential receptor is approximately 350m from the site, emissions are considered to be insignificant and assessment of odour and dust has been scoped out of the air quality assessment.’ It should not be scoped out. Community members were disturbed by ‘sulphidey’ smells during the 2018 flow test, both in the village and on the B2036 beside the site. As the wind blew unusually in the direction of Staplefield village during the well test, people there also reported unpleasant smells.

We remember that 'odour management' last time was to consist of a worker periodically sniffing.

WSCC might question whether Angus Energy's proposed acidisation is a simple acid wash, as they say it is, or stimulation (out into the formation, at a certain pressure). Acidisation is in the realm of the EA, but further EA permits would be required for the Extended Well Test, and The OGA would require a Hydraulic Fracture Plan if hydraulic stimulation were included in the Extended Well Test. (Note that the Conservative Party has already U-turned on its fracking moratorium.) The OGA do not require a Hydraulic Fracture Plan for a 'conventional completion acid wash' which the 2018 one could have been and the new one clearly is not.

Angus Energy and its local subsidiaries are not in the best of health, financially. Nor are Cuadrilla, who own three-quarters of the licence.

Angus Energy have not made a profit in recent years and need to be funded by shareholders or outsiders whenever they need to do or buy or rent anything. Their share price has dropped to under 1p. We are concerned that they will cut corners and put our safety, health and environment at risk. If an accident should happen, we are concerned that they would not have the means to deal with the fallout. We are concerned that they will not have the means to decommission the site, and will not be required to set sufficient funds aside.