

Dear ETI Member,

We would like to add the following information to our submission to you - further concerns about Rathlin Energy's proposal to drill at Ballinlea in light of problems arising from their operations in England.

1. The company has had to suspend operations at their West Newton site in Yorkshire. They faced unforeseen problems relating to odours, gas flaring, and associated complaints of health impacts from residents.

2. An independent investigation examined email correspondence between the site and the Environment Agency, released under a Freedom of Information request, and documents from the Health and Safety Executive, as well as the Compliance Assessment Reports (CAR forms), compiled by the Environment Agency following inspections at West Newton. It discovered that:

"the site and its operator, **Rathlin Energy breached environmental permit conditions eight times in three months.**

The company:

- Experienced equipment problems
- Faced criticism for record-keeping and management systems
- Is being investigated for safe working practices by the Health and Safety Executive
- Failed to meet deadlines for actions required by the Environment Agency
- Felt "besieged" by what it called false allegations and questioned whether some complaints were true."^[1]

3. People in Ballinlea and on the North Coast are particularly concerned that despite these experiences at West Newton, Rathlin Energy's recent Environmental Impact Assessment report in relation to Ballinlea states that:

"On the basis that no detrimental health effects are predicted, no health monitoring scheme is warranted if the proposed project goes ahead."^[2]

4. Rathlin Energy's response to the findings of the investigation indicates that they did experience unanticipated problems:

"Additionally, in the case of exploratory oil and gas drilling and testing operations, there are by the specific nature of these exploratory operations a number of unknowns, ranging from the actual geology to formation pressures and formation fluids or gas composition.

In the case of the testing programme at Rathlin's West Newton well, some of these unknowns gave rise to unanticipated on site operational challenges. These included odour issues associated with the formation gas discovered and the operation of the flare.

The EA did visit our site on a number of occasions to assess Rathlin's compliance with the issued permits.

It important to recognise that the original permits issued for West Newton did not have a requirement for Odour Management as it was not anticipated by either the EA or Rathlin and the flaring solution(s) that were originally agreed by the EA for the test operations were overturned, requiring Rathlin and the EA to source and agree a suitable substitute flaring solution during the course of the on site operations.”

5. Protect Our North Coast members are concerned about the implications of this for Ballinlea and the North Coast, particularly given Rathlin Energy's lack of acknowledgement of potential health impacts in their EIA documents, and the resource constraints and long-term systemic problems faced by the regulatory authorities in Northern Ireland.

For further information on the investigation and problems at the West Newton site please see:

<http://drillordrop.com/2015/02/05/investigation-what-went-wrong-at-west-newton/>

<http://drillordrop.com/what-went-wrong-at-west-newton-rathlin-energy-response/>

and

<http://www.theguardian.com/environment/2014/sep/19/yorkshire-wolds-gas-fracking-shale>

Kind regards,
Protect Our North Coast

[1] <http://drillordrop.com/2015/02/05/investigation-what-went-wrong-at-west-newton/>

[2] <http://epicdocs.planningni.gov.uk/ViewDocument.aspx?uri=2555727&ext=PDF> Non-technical Summary p22.