

KEEP Kirdford and Wisborough 'Green'

UKOG further applications for extensions at the Broadford Bridge drilling site

WSSC/001/22

Wood Barn Farm, Adversane Lane, Broadford Bridge,
Billingshurst, West Sussex, RH14 9ED

Amendment of condition no. 1 of planning permission
WSSC/078/19/WC to enable the retention of security fencing,
gates and cabins for a further 24 months

WSSC/002/22

Wood Barn Farm, Adversane Lane, Broadford Bridge,
Billingshurst, West Sussex, RH14 9ED

Amendment of condition no. 1 of planning permission
WSSC/079/19/WC extending the permission by 24 months to
enable the completion of phase 4 site retention and restoration

**KKWG strongly objects to this application for a
further 4TH extension to UKOG's residence at this site
for the following reasons set out below:**

KEEP Kirdford and Wisborough 'Green'

Introduction:

Keep Kirdford and Wisborough Green, KKWG, in West Sussex is a constituted not for profit residents' organisation formed in 2013. Its aims are to:

- i. to engage with planning applications, public inquiries and any other statutory processes to protect the parishes of Kirdford and Wisborough Green and surrounding areas against any development of onshore oil and gas Exploration and or possible Exploitation / Extraction
- ii. to bring together residents of both parishes [and their supporters] to actively campaign against any form of exploratory drilling and related/subsequent oil and gas activity throughout all of Sussex and the Weald
- iii. to work in partnership with like-minded organisations in order to protect and enhance the local environment and community ensuring that any proposed development is sustainable and appropriate for the area by establishing the evidence and following the latest research in relevant topics.
- iv. Members of the group have participated in drawing up the Wisborough Green Neighbourhood Plan, ensuring its conformity with national and local plans and with regard to the NPPF, 2012; and again since CDC has been given a larger housing allocation,2021-22. This voluntary role includes the group considering what we want for the future of the Parish of Wisborough Green, West Sussex; carrying out a series of consultations with local residents; future proofing our policies and ensuring that they conform to District, County and national policies.
- v. Members also have access to experts and seek their advice and input where required.

KEEP Kirdford and Wisborough 'Green'

1. This is an application originally made and approved in 2013 but not started until 2016 with the intention of finishing in 2019.....As you will see from the statements made to the WSCC Planning Committee in Appendix A, this drilling well never worked, quite possibly spilled its contents and chemicals used into the surrounding heavily faulted area which could potentially reach the River Arun; and, was shut down and taken away in March 2019 so why is UKOG seeking to retain an unworkable site? They have had enough time in which to assess the operation of this failed well; and should pack up and restore the site. Mind you their restoration efforts at the UKOG drill at Markwells Wood required a Court order the South Downs National Park, SDNP, has asked that the 2,000 trees they planted but which died are replaced (See Appendix 2).
- 2, UKOG has made a number of applications for onshore Oil & Gas developments across the Weald in Surrey, West Sussex and on the Isle of Wight. In its Community and Engagement leaflets the company claims to have “*successful operation of oil & gas sites in SE England, in harmony with their surrounds and neighbouring residents*”.
3. This is an assertion and it is not a claim supported by evidence or recognised by local residents at Broadford Bridge drilling site three miles to the south of Billingshurst, Markwells Wood to the north of Chichester or Balcombe.

We OBJECT to these applications

4. Many things have changed since this application was first made. This is now the age of the Climate Emergency (as declared by the UK government) and of the Biodiversity Emergency (declared by IPBES, May 2019); the latest UN report pointed to Climate breakdown accelerating rapidly, many of the impacts will be more severe than predicted and there is only a narrow chance left of avoiding its worst ravages.
5. Even at current levels, human actions in heating the climate are causing dangerous and widespread disruption, threatening devastation to swathes of the natural world and rendering many areas unliveable, according to the landmark report published on Monday February 28th, 2022.

Our objection takes account of

KEEP Kirdford and Wisborough 'Green'

6. Incompatibility with the Government's Environment POLICY 25 Year Environment Plan, '*A Green Future: Our 25 Year Plan to Improve the Environment*', sets out what the government will do to improve the environment, within a generation.

This application does not conform with this policy.

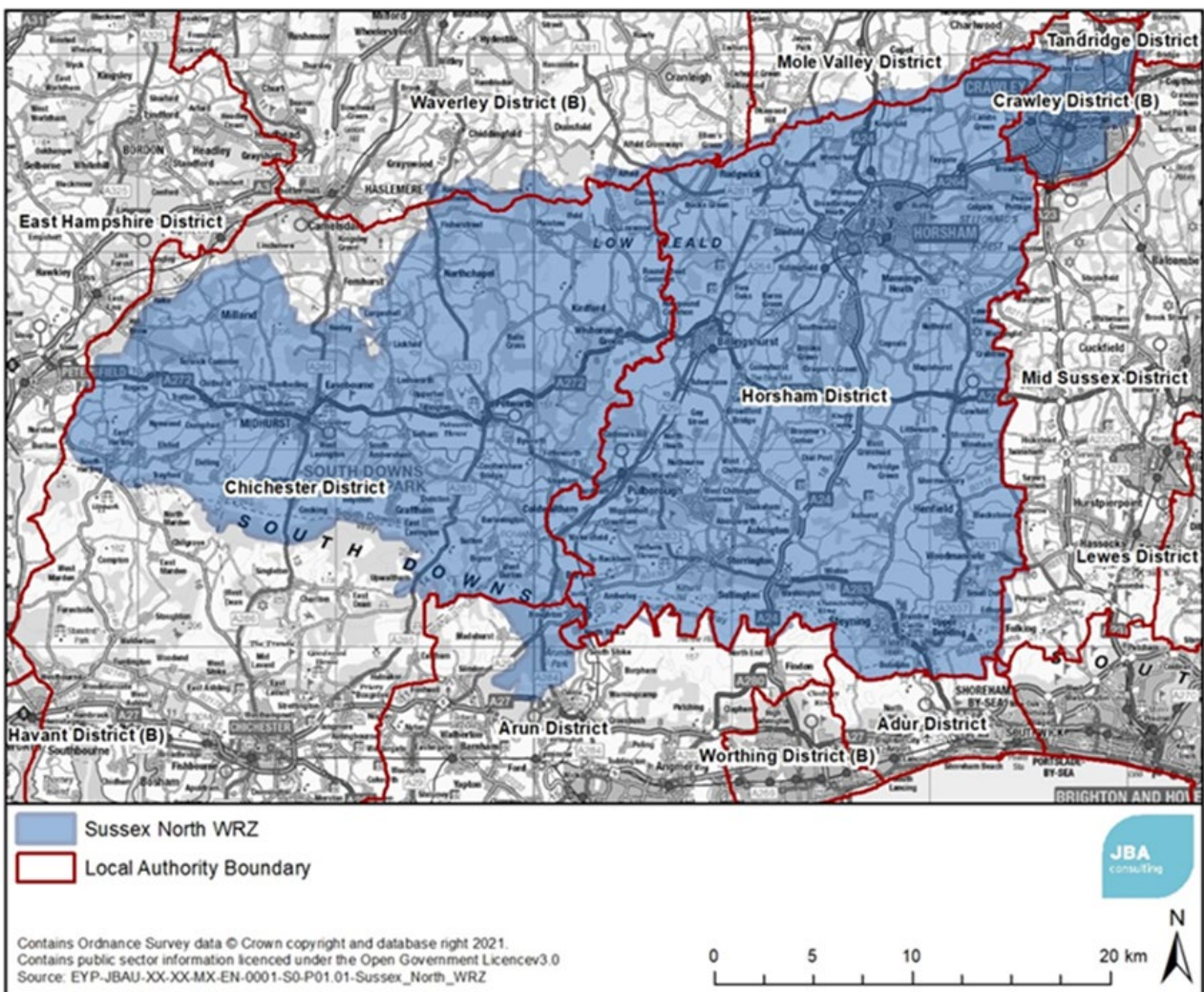
7. WSCC Minerals Plan's strategic objectives. KKWG has nothing to add to what we have said in our earlier and detailed representations. We stand by those submissions
8. Relevant environmental regulatory requirements and technical standards.
9. Policy adopted since 2016 including the most recent version of the National Planning Policy Framework, July 2021
10. While UKOG states that they have no intention of drilling, on 12th February 2022 Government Minister Zak Goldsmith said

“To replace half the gas we import, we'd likely need around 6,000 new wells, with all the associated industrial equipment & endless movements of trucks ferrying toxic chemicals and wastewater to and from sites. It's hard to imagine communities across the UK being ok with that. It's hard to overstate just how unpopular fracking is with the British public. The last BEIS attitude tracker showed only 18% support (76% supported onshore wind). People do not want large-scale industrialisation of the British countryside. And given the gas would be produced by private firms and sold at the highest price (internationally), there would likely be no measurable impact on UK gas prices anyway”.

11. No **Biodiversity Net Gain** has been suggested and as part of the application and that becomes a legal requirement in September 2023 and the issues raised: are covered in this refereed article, zu Ermgassen, S.O.E., Marsh,S., Ryland,K., Church,E., Marsh,R., Bull, J. W. (2021). Exploring the ecological outcomes of mandatory biodiversity net gain using evidence from early-adopter jurisdictions in England. *Conservation Letters*.14: e12820.<https://doi.org/10.1111/conl.12820>

KEEP Kirdford and Wisborough 'Green'

12. The shape and use of the land around the site in terms of its potential impact, whether that impact is acceptable and what pollution control or abatement may be required. There is an associated risk that the liquids used in the well could have escaped given the well failure.
13. This current application should have provided a detailed analysis of the impacts that the operation has had to date to include the detrimental impacts on the residents at Adversane. See the Minutes of the Billingshurst Parish Council on July 4th, 2019.
14. And a new consideration is that of water supply which is now restricted in the area. The pumping station at Hardhat on the junction of the River Rother and Arun means that any project has to be “water neutral” as Natural England is concerned about the potential impacts on the internationally important Special Protection Area. SPA on the River Arun.



KEEP Kirdford and Wisborough 'Green'

15. **Infrastructure** – The application has not addressed a significant infrastructure issue which is that of a lack of a suitable sustainable supply of water in this area and an additional potential threat to the Upper Arun Special Protection Area which has been highlighted by Natural England, NE.
16. Southern Water announced that in the Sussex North Water Supply Zone they might not be able to supply water to the 4 Parish Councils in the North of Chichester District and in Horsham DC. This has led to a current halt to planning proposals and to the suspension of the Loxwood NP. See map above.
17. **Omissions:** the carbon footprint of the development has not been assessed and there is now a UK commitment to Net Zero.

This operation has run out of time, are inappropriate and the applications should be **REFUSED**.

KEEP Kirdford and Wisborough 'Green'

APPENDIX 1:

Broadford Bridge – statements made to WSCC Planning Committee by KKWG with respect to earlier applications for more time.

*Dedicated to the late Professor Stephen Hawking,
"We Are Close to Tipping Point Where Global Warming Becomes
irreversible"*

Introduction to statements:

Good afternoon Cllrs. My name is JILL SUTCLIFFE, I live in WISBOROUGH GREEN, have served on the Parish Council and lived in West Sussex for 30 yrs.

I am an environmental scientist who worked for the Government advisory body, Natural England. What concerns me are the information gaps and I intend to focus on 3 issues:

- The company's plans
- Invisible harms, and
- Restoration plans

Sept 2018: Presentation to WSCC Planning Committee for 2nd UKOG application for Extension of time at Broadford Bridge:

Four years ago (July, 2014) I attended this meeting when you turned down the Celtique Energie (now re-named KOGI and a UKOG subsidiary) application for an Exploratory drill on land to the south of Boxal Bridge and, I'd like to thank you for that decision. Now, having seen what has happened at Broadford Bridge I am doubly glad that you reached that conclusion and urge you to also turn down these applications which would amount to an almost **40 %** increase ie from 49 to 67 months.

Kimmeridge Oil & Gas Ltd, KOGI, plans:

KEEP Kirdford and Wisborough 'Green'

- 1. Three times we have been told that the site will be restored** - originally by the company: "The site is restored if **no oil or gas** is discovered, [and takes] 6 weeks," a point repeated by Stuart Catterall, then company Chief Operating Officer at the Planning decision meeting, 2013, "*If nothing was found the site would be remediated.*" And, in last year's Planning Officer's report: "If the tests show that there is not a viable hydrocarbon resource, the well would be 'abandoned' by plugging the borehole and the site restored."
- 2.** The independent *Contrarian Investor* (Feb, 2018) commented "*Low reservoir productivity indicates zone likely not economically viable.*".....and "*Apparently BB-1-z was now not in the "sweet spot"!*"
- 3.** UKOG reported in March "*Flow rates....are likely sub commercial*" leading to independent industry commentators stating that nothing had been found. So I suggest restoration should commence now on Sept 15th as per your Condition 1.

KOGL Planning Application:

- 4.** The Planning Application for the proposed extension states that it is for the Exploratory phase, not the Appraisal phase and,
- 5.** Continues: "*Testing phases of the work are **now complete***"... "**testing completed March 2018,**..." it has become clear that the data required to complete the review process will not be available within the consented timeframe." So, the company has already assessed what they found by drilling... why then this application for more time?
- 6.** Two issues: What data? Surely this is the Appraisal phase? And, the application refers to other sites in the Weald which are not within WSCC jurisdiction and thus

KEEP Kirdford and Wisborough 'Green'

cannot and should not be a consideration in the current application. See Planning Officer's report (top of p 98).

7. At the Markwells Wood site, NW of Chichester in the South Downs National Park, UKOG (same company) has been served with a Breach of Condition notice after failing for 2 years to restore that site. Can we rely on their claims that they will restore the site at Broadford Bridge?

History:

8. Well failed: The operation of the drilling well was flawed. The cement bonding failed, ie a failure of well integrity, and it is quite possible that the liquids including chemicals put down the well got out and are somewhere underground. It was reported (*RNS Number 6747N*, UKOG PLC, 10 August 2017) that the original well developed a washout zone, where drilling fluid was lost.

Additional information:

9. Horsham District Council stated *"The District Council would have concerns with the longer term retention of this development as it would be detrimental to the landscape character of this countryside location."* This does not appear to be recorded in the Planning Officer's report.

KEEP Kirdford and Wisborough 'Green'

- 10. Invisible harms: Air pollution, Water pollution and Geological** structure all present potential unseen harms. The latter plus site restoration are the responsibilities of the Mineral Planning Authority (NPPF, 2018). New research demonstrates that a minimum horizontal distance of 850ms needs to exist between a fault and any drill site. This is *NOT* the case at Broadford Bridge which was drilled through a fault line. Such faults can move at any time as shown by a nearby earthquake recorded in 2005 by the British Geological Survey. There is no technology available which can predict this.

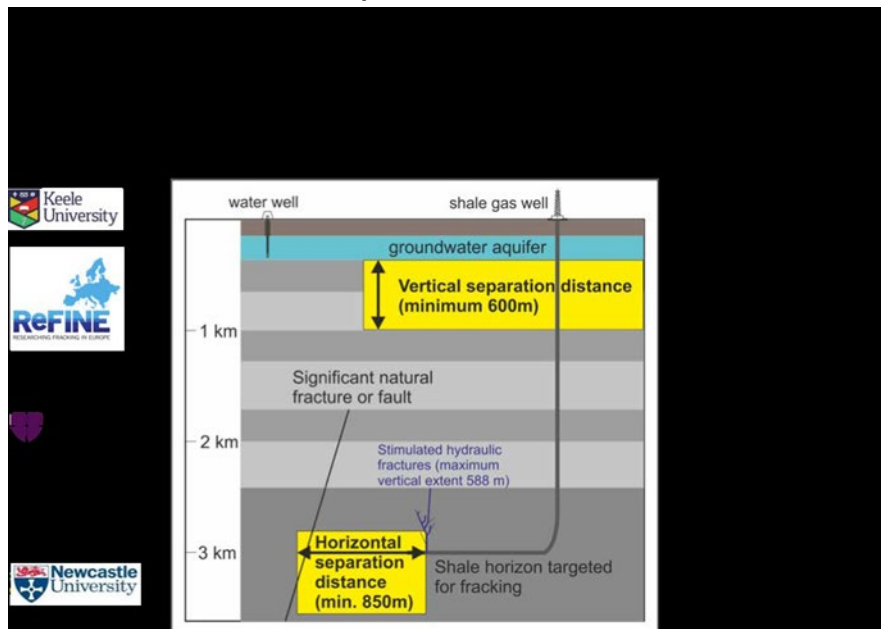


Fig 1: Horizontal buffer zone and vertical separation distance Prof Peter Styles, 2018

Summary:

1. The **original permission** stated the site must be restored if **no oil/gas found**
2. KOGL/UKOG have stated no oil/gas has been found
3. Permission was for Exploration stage only and the company stated that this ended March 2018.
4. UKOG is already under enforcement action for repeatedly failing to restore the Markwells Wood site.

KEEP Kirdford and Wisborough 'Green'

5. Key facts missed from officer's report and thus committee not being presented with all relevant information.
6. Officer's report also contains data/references to sites outside of WS which are immaterial to this application.

REFERENCES:

1. Celtique Energy information display boards, Billingshurst Community Centre, June 22-23, 2012
2. Stuart Catterall, Chief Operating Officer at Celtique Energie, WSCC Minutes Planning committee meeting, 5/2/2013, Para 124
3. Planning Officer's report, 12/9/2017
4. *UKOG Regulatory News Service*, 29th March, 2018, Update Broadford Bridge; and, RNS No 3220J; End of year results, 2017, March 29th, 2018 Yr ended 31/12/2017, RNS-3788J
5. *Site Restoration Plan 3261/BB/18* and WSCC Planning Committee meeting minutes, 15/9/2017
6. *Contrarian Investor*, UKOG update February 21st 2018 - More Broadford Bridge disappointment AIM oil and gas, UKOG, Weald Basin UK
7. KOGI Planning application via Planning Portal, 14/6/2018
8. WSCC Planning Officer's report, 2018 p98
9. SDNPA , *South Downs Planning latest news*, July 19th, 2018, UKOG Planning breach

17 July 2018 Markwells Wood, Back Lane, Forestside, Rowlands Castle, PO9 6EB The following condition has not been complied with:

2. This permission shall be for a limited period only expiring on 31 September 2016 {sic}, by which date the operations hereby permitted shall have ceased, all buildings, plant and machinery, including foundations, hard standings shall have been removed from the site, and the site shall be restored in accordance with the approved restoration scheme.

KEEP Kirdford and Wisborough 'Green'

- 10.** *RNS No 6747N, 10/8/2017*
- 11.** Horsham DC, Planning Committee Agenda Item No. 4, 12 Sept, 2017 County Matter Mineral Application Amendment of condition no. 2 of planning permission WSCC/052/12/WC to allow for a further 12 months of continued operations to enable the completion of phase 3 testing and phase 4 restoration or retention
- 12.** Peter Styles, Prof. Emeritus, Keele Univ, May 2018, *Fracking and Historic Coal Mining: Their relationship and should they coincide?* Report.

KEEP Kirdford and Wisborough 'Green'

July 2020 Presentation to WSCC Planning Committee for 3rd UKOG application for Extension of time at Broadford Bridge:

This is the third time we meet concerning this temporary structure at the Broadford Bridge (oil) exploratory drilling site.

The drill was removed two years ago after the original well developed a washout zone where drilling fluid was lost . UKOG stated that the well produced little of "commercial value". So, no economic gain...and it didn't work so let's not retain it. And the company has repeatedly said that if they found nothing they would stop and restore the site. Their worst case scenario allocates 30 months for retention of which they've had 27 months so they should finish including that restoration of 6 weeks by October.

While the drill was working, harm was done. Above all, Adversane residents suffered from the enormous disruption Let's not burden Adversane again (Billingshurst PC Meeting minutes, July 4th, 2019).

The company maintains that it "might" need to use the well to access/work with those at Horse Hill, Surrey....Too late, too late. Fossil Fuel companies need to stop and clear up the damage that has been created to the climate by their pollution and should pay according to the Polluter pays principle.

This time, Cllrs, the issue is PERSONAL – and by that I do not mean for you as people, I mean in your role of representing the residents of Sussex and extending to them a Duty of Care.

Climate change

- 1. IF the average increase in temperature exceeds 1.5°C - that could happen within the next 10 years - we**

KEEP Kirdford and Wisborough 'Green'

will start losing bits of the county to Sea Level Rise – Climping, West Wittering + Selsey on the Manhood Peninsula which form part of the “buffer zone” for Chichester . The independent Climate Change Committee reports indicate that the UK is not meeting its emissions targets. The UK Government Climate Emergency requires this county to support it to reach its targets and, there is a clear legal requirement, that local planning authorities (LPAs) must address climate change.

Financial failure

2. UKOG is in a precarious financial position – today the share price <1p. The county should consider establishing a bond. The NPPF, the rulebook for planning authorities, and ministerial written answers, make the MPA responsible for taking financial security for restoration "if they consider it necessary". You were advised last time that the MPA did not consider this to be necessary. Perhaps that view has changed?

Potential contamination

3. Given the well integrity failure, potential contamination could yet come to light. This is a real risk that the chemicals used in the drilling could have got into the environment, an issue flagged up by former EA staff member Graham Warren. The Weald is very faulted which could facilitate the movement of toxic liquids to places where they would not be wanted and, from which they could not then be removed (RNS ibid)

Sir James Bevan, CEO of the EA, 24 Oct, 2019 said:

"We need to mitigate the damage from climate change, by reducing or stopping the human activities which are causing it. We can do that..., by cutting our emissions of greenhouse gases."

[Climate scientists give society 10 years only in which to address this issue. The UK was a world leader with its

KEEP Kirdford and Wisborough 'Green'

Climate Change Act in 2008. We have failed to implement it and now we are lagging. We must do better.]

The applicant has stated repeatedly that if they found nothing they would stop and restore the site. They found nothing so they should go

Both the NPPF (Para 205e) and the Joint Minerals plan (of 2018) require **restoration and aftercare "at the earliest opportunity"**.

Cllrs: There is no substitute for taking action. Refuse this unnecessary, untimely, application.

Thank you for your attention.

KEEP Kirdford and Wisborough 'Green'

APPENDIX 2:

An account of UKOG failure to restore the site at Markwells Wood, in the South Downs National Park to the north of Chichester

National Park orders firm to replant abandoned oil site after trees died

BY RUTH HAYHURST ON FEBRUARY 1, 2022 , *Drill or Drop news*

A tree planting scheme on the site of a former oil site in the South Downs National Park has failed.

UK Oil & Gas plc (UKOG) said it planted 2,000 trees and shrubs in 2020 at the Markwells Wood site, north west of Chichester.

But two years on, most of the saplings have died and much of the site is overgrown.

(South Downs) National park officials have now ordered UKOG to replant in the next few weeks. And local people have asked for soil sampling to check whether the site is contaminated.

The Markwells Wood site is in an area of ancient woodland and tree planting was a key part of the restoration work required by the site's planning permission. Another condition imposed a five-year aftercare programme to ensure restoration was successful.

A spokesperson for the South Downs National Park Authority, SDNPA, said:

"Our officers have checked the site and many of the whips have failed, as can happen with replanting schemes.

KEEP Kirdford and Wisborough 'Green'

"We have informed the operator and they are undertaking the replanting this season.

"The site will continue to be monitored by the Authority's Minerals and Waste Team as part of the agreed aftercare scheme."

A 1km access track to Markwells Wood has been removed and is no longer visible. But on the 0.5ha well pad, many of the plastic tree guards contain just the support stake or dead saplings.

Markwells Wood Watch, a group which campaigned against oil operations at the site, has been monitoring the restoration.

A spokesperson for the group told *DrillOrDrop*:

"We are concerned that the replanting of Markwells Wood has failed. The most successful plants on the site are weeds and we fear that the soil could have been contaminated by the drilling activity. This is why we have asked for soil tests to be carried out before any new trees are planted.

"This is disappointing for two reasons; UKOG has again demonstrated a lack of environmental credentials and this failure has further delayed much needed carbon capture".

The tree planting was carried out in January 2020. This was 18 months after the South Downs National Park Authority issued an enforcement notice to UKOG to abandon and restore Markwells Wood.

The Markwells Wood Watch spokesperson said:

"If our experience is typical, there appears to be no effective, independent monitoring of the decommissioning of onshore wells in the UK.

KEEP Kirdford and Wisborough 'Green'

"The Environment Agency and the Health and Safety Executive rely on the contractor to do a proper job. This is not good enough, especially in an environmentally sensitive area such as Markwells Wood, which sits above an aquifer that is the source of fresh water for many thousands of people."

DrillOrDrop invited UKOG to comment but it did not respond.

Markwells Wood, January 2022. Photo: *DrillOrDrop*
The tree planting failure is the latest stage in a drawn-out process of decommissioning Markwells Wood.

The site was first granted planning permission in 2009. A single well was drilled in November 2010 but never went into production. Planning permission was later extended in 2012, 2013 and 2015.

In September 2016, 10 days before the most recent permission expired, UKOG submitted an application for further drilling and 20 years of hydrocarbon production.

This application attracted a large number of objections, including from the Environment Agency and Portsmouth Water, which said the proposals could pose an unacceptable risk to groundwater.

In May 2017, UKOG withdrew the application. It promised scaled-back proposals but lost its access right to the site.

Nearly two years later, the company confirmed in a statement to investors it had pulled out of Markwells Wood.

It told the SDNP that the well had been plugged and abandoned on 14 January 2019. But another 12 months went by before the tree planting work began. The replacement planting will now be three years after plugging and abandonment.

KEEP Kirdford and Wisborough 'Green'

History of the UKOG involvement at MARKWELLS WOOD to the north of Chichester

Markwells Wood

Licence number: PEDL126

UKOG interest: 100%

The Markwells Wood-1 discovery well was drilled in 2010. It is operated by UKOG's fully-owned subsidiary UKOG (GB) Limited. The discovery is a conventional Jurassic Great Oolite limestone reservoir, the same as in the Horndean producing oil field (UKOG 10%), which is located 3 km to the west.

The well was tested over a 6-month period in 2011-12, producing 3,931 bbl of oil.

UKOG has applied to extend the Markwells Wood planning permission to 30 September 2016. Approval is expected shortly.

Xodus recently completed a Competent Person's Report ("CPR", or independent reserves review) for Markwells Wood, estimating Best Case (P50) STOIIIP of 45.6 MMbbl and 2C Contingent Resources of 1.25 MMbbl. These Contingent Resources are based on a 5-well, multi-phase potential development.

Source: UKOG

Xodus also estimated in their CPR that, by re-drilling the Markwells Wood-1 well as a horizontal lateral, the reservoir could produce 600,000 bbl of oil in a P50 (Best Case) over 40 years of production. The Horndean field has been in stable production since 1987 producing a gross total of 2.4 MMbbl to date.

KEEP Kirdford and Wisborough 'Green'

Key facts

Address: Markwells Wood wellsite, South Holt Farm, Back Lane, Forestside, Stoughton, West Sussex

Operator: UK Oil & Gas Investments Ltd (UKOG)

Planning application for appraisal and production: SDNP/16/04679/CM (see timeline below for earlier planning applications and permissions)

Licence: PEDL126 Licence now removed by OGA from list of UK onshore licences

Status: Abandoned

Timeline

Updated 5/10/2021211005-markwells-wood

31 March 2020

UKOG annual report says Marwells Wood has been restored and the site planted with 2,000 trees and shrubs. Details

24 January 2019

UKOG confirms it has abandoned Markwells Wood because of technical and regulatory risks. Details

23 November 2018

Residents report work is underway to abandon Markwells Wood. Details

17 July 2018

South Downs National Park Authority issues breach of condition notice against UKOG. [Link to notice](#)

28 March 2018

Residents say they are delighted that UKOG has lost access rights to Markwells Wood oil site. Details

KEEP Kirdford and Wisborough 'Green'

27 March 2018

News emerges that UKOG lost access rights to Markwells Wood in summer 2017.

15 March 2018

Campaigners announce they will challenge the UKOG injunction over sites including Markwells Wood.

1 March 2018

UKOG applies for an injunction over sites including Markwells Wood.

3 January 2018

Villagers accuse Oil and Gas Authority of a lack of robustness over allowing PEDL126, which includes Markwells Wood, to move to the production phase without the usual requirements.

16 October 2017

In a letter to the South Downs National Park Authority, UKOG drops plans for 20 years of oil production, three new oil wells and water injection well.

29 August 2017

Meeting of MP Gillian Keegan with constituents living near Markwells Wood, to discuss UKOG's plans for the site, 6.30pm-8pm, Foreside Hall, Forestside, West Sussex PO9 6EG

30 June 2017

Extended deadline for the second term of PEDL126

2 May 2017

South Downs National Park Authority announces UKOG has withdrawn the planning application for drilling and oil production at Markwells Wood. Details

7 April 2017

UKOG says it remained "fully committed" to the potential of Markwells Wood. It said a consultants's report proved "beyond

KEEP Kirdford and Wisborough 'Green'

any reasonable doubt" that drilling methods were "safe, secure and of no concern to the environment".

6 April 2017

Environment Agency objects again to UKOG drilling plans, saying they could "*pose an unacceptable risk to groundwater*".

1 April 2017

Study commissioned by Markwells Wood Watch concludes that water contaminated by oil exploration or production at Markwells Wood could quickly reach the Bedhampton and Havant Springs, which supplies drinking water to the Portsmouth area.

28 March 2017

Closing date of South Downs National Park Authority public consultation on additional information for planning application.

6 March 2017

South Downs National Park Authority publishes additional information on planning application and opens public consultation.

24 November 2016

South Downs National Park Authority asks UKOG for more information about the location of the wells, alternative sites, impacts from VOCs, volume of hydrocarbons, revised groundwater risk and landscape impact assessments, impact of noise and vibration on bats, impact of greenhouse gas emissions and the use of acid

16 November 2016

Meeting between Portsmouth Water, Environment Agency and UKOG over the application's risk assessment to groundwater

15 November 2016

Portsmouth City Council objects to UKOG plans for Markwells Wood

KEEP Kirdford and Wisborough 'Green'

2 November 2016

Environment Agency objects to the UKOG plans for Markwells Wood

13 October 2016

Portsmouth Water objects to UKOG application for Markwells Wood

3 October 2016

Public meeting in Forestside votes to oppose UKOG application for Markwells Wood

30 September 2016

Expiry of planning application SDNP/13/01347/CND granted on 14 October 2015.

20 September 2016

South Downs National Park Authority validates application (SDNP/16/04679/CM) from UKOG for Markwells Wood. The application is for: appraisal and production of oil incorporating the drilling of one side-track well from the existing well (for appraisal), three new hydrocarbon wells and one water injection well, and to allow the production of hydrocarbons from all four wells for a 20 year period. DrillOrDrop review and UKOG statement

8 September 2016

UKOG puts up signs around Markwells Wood giving notice that it will be applying for permission for new drilling and oil production.

6 September 2016

South Downs National Park Authority publishes scoping opinion giving details of what should be included in an Environmental Statement

2 August 2016

KEEP Kirdford and Wisborough 'Green'

UKOG applies to the South Downs National Park Authority for a scoping opinion (SDNP/16/03912/SCOPE) for appraisal drilling, extended well testing, production and site restoration

12 July 2016

South Downs National Park Authority responds to Barton Willmore's screening request (SDNP/16/03075/SCREEN) that an Environmental Impact Assessment (EIA) would be needed and the development would be likely to have significant effects on the environment (*NB Barton Willmore being brought out by US firm this week, March 15th, 2022*)

1 July 2016

Oil and Gas Authority moves PEDL126 (exploration licence around Markwells Wood) to 2014 Model Clauses and requires a field development plan for the Markwells Wood-1 discovery by 30 June 2017

15 June 2016

Barton Willmore, consultants for UKOG, requests an Environmental Impact Assessment (EIA) screening opinion. It argues that significant effects are unlikely and an EIA is not needed Request letter and report

14 October 2015

South Downs National Park Authority grants an extension of planning permission for Markwells Wood under delegated powers until 31 September 2016 (see decision notice)

13 April 2015

UKOG announces it has bought Magellan's 40% stake in PEDL126 (including the Markwells Wood-1 well), bringing its stake to 100%

26 March 2015

UKOG applies for permission to the South Downs National Park Authority (SDNP/15/01470/CONDC) to extend operations for a further 18 months for continued operations, the plugging and

KEEP Kirdford and Wisborough 'Green'

abandonment of the existing well and final restoration of the site

30 December 2014

Magellan Petroleum, a partner in Markwells Wood-1, warns that the well could be abandoned if new companies can't be found to take it on Details Annual report

20 October 2014

UKOG announces it has completed acquisition of Northern Petroleum's UK production and exploration oil and gas licence interests – including PEDL126 and Markwells Wood-1 – for £1.5m

24 July 2014

UKOG announces a conditional agreement to acquire Northern Petroleum Plc's UK production and exploration oil and gas licence interests – including PEDL126 Markwells Wood – for a total consideration of £1.5 million

22 November 2013

South Downs National Park Authority issues a decision notice approving permission until 31 March 2015

22 March 2013

Application to the South Downs National Park Authority (SDNP/13/01347/CND) for a further two years for oil and gas exploration at Markwells Wood

23 January 2013

West Sussex County Council issues a decision notice approving the application WSCC/011/12/SO/SDNP for an extension of permission until 31 March 2013

12 March 2012

West Sussex County Council registers application WSCC/011/12/SO/SDNP from Northern Petroleum for an extension of time at Markwells Wood

KEEP Kirdford and Wisborough 'Green'

7 September 2011

Northern Petroleum reports it has started operations for an extended well test at Markwells Wood-1

6 January 2011

Northern Petroleum announces that logs confirm the Great Oolite drilled reservoir at Markwells Wood-1 is oil bearing above the Horndean Field oil water contact of 4,446ft

23 December 2010

Northern Petroleum announces live oil was encountered in the Markwells Wood-1 well in the primary reservoir target

21 November 2010

Northern Petroleum announces the Markwells Wood-1 well was spudded at 15.00 hours

12 November 2010

Northern moves drilling equipment onto the Markwells Wood-1 site

12 January 2009

West Sussex County Council issues decision notice approving application SO/3152/07 with a condition that permission is for three years from the date of commencement of site construction.

19 June 2007

West Sussex County Council validates an application (SO/3152/07) from Northern Petroleum for a temporary hydrocarbon exploration site

KEEP Kirdford and Wisborough 'Green'

SITE RESTORATION – to be or not to be....

Dear South Downs National Park Authority,

In March, this year, you issued a Breach of Condition Notice on the oil exploration company, UK Oil and Gas (UKOG), for the site at Markwells Wood, Forestside. Subsequently you withdrew this notice on "technical grounds". Please will you clarify what these technical grounds are, and the full implications for the site at Markwells Wood.

I understand that you are still pursuing site restoration at Markwells Wood. Please would you confirm this. If so, what measures have you taken to ensure this?

In your original BCN you stated that UKOG had to complete the following work within six months:

"Remove all buildings, plant and machinery, including all buildings, hard standings from the site. The well to be plugged and abandoned in accordance with the Environmental Statement as listed in Condition 1 of SDNP/15/01470/CONDC."

It is nearly three months since you issued the BCN. Have UKOG shown any signs of complying with this condition?

It has recently become public that UKOG no longer have legal access to the site, and that this has been the case for almost a year. I know that the landowner has offered UKOG the opportunity to draft an agreement that would allow them access for maintenance and for restoration, but I am not aware that UKOG have taken up this offer. Have UKOG informed you of this problem? What would be the response of the SDNPA if UKOG claim they are unable to restore the site because they no longer have access?

KEEP Kirdford and Wisborough 'Green'

UKOG are continuing to publish statements that they intend to submit a renewed application for oil exploration at the site. Please would you let me know if UKOG have communicated this intention to you. If so, would you please let me know the date when they did so, and what the response of the SDNPA has made to this. Also, if such an application is made, how would this affect any requirement to restore the site.

UKOG has commenced work on a Markwells Wood Field Development Plan ("FDP"), which upon completion, will be submitted to the OGA for field development consent. UKOG will also use the FDP to help compile and submit an application to the South Downs National Park Authority for the necessary planning consent to drill the planned Markwells Wood-1 sidetrack.

The trees which formed the "restoration plan" at Markwells Wood, have died and SDNP has asked for them to be removed.

KEEP Kirdford and Wisborough 'Green'

References:

CCC, 2020, Independent Climate Change Committee, *6th report; and report for Local Authorities*

DBEIS, 2017, *Clean Growth Strategy. An ambitious blueprint for Britain's low carbon future.*

Hazeldine, S, 2019, Science Media Centre, NOVEMBER 2, Expert reaction to Government decision to halt fracking (NB NOT in southern England)

IPCC, 2022 Intergovernmental Panel on Climate Change *6th assessment Report* 28 February 2022:
<https://www.ipcc.ch/report/ar6/wg2/>

IEA, 2022, *Net Zero by 2050, A Roadmap for the Global Energy Sector*
[https://www.theccc.org.uk/publication/local-authorities-and-the-sixth-carbon-budget.](https://www.theccc.org.uk/publication/local-authorities-and-the-sixth-carbon-budget)

MHCLG 2019, *National Planning Policy Framework, NPPF*. The NPPF confirms that AONBs are equivalent to National Parks in terms of their landscape quality, scenic beauty and planning status. Specific policies in the Framework indicate development should be restricted.; MHCLG. July 2021, *National Planning Policy Framework, NPPF*.

Nature, 2015, Jan 7th, The geographical distribution of fossil fuels unused when limiting global warming to 2°C, Christopher McGlade & Paul Ekins

NERC, 2006, *Natural Environment and Rural Communities (NERC) Act 2006*

Zetland Group, 2021, *Statement on Behalf of the Appellant, UKOG (3234) Ltd* Feb 2, 2021