

KEEP Kirdford and Wisborough 'Green'

UKOG WSCC/046/23

Application Dec 23rd, 2024 at Broadford Bridge drilling site: Amendment of condition no. 1 of planning permission WSCC/079/19/WC extending the permission by **24 months** to *enable the completion of phase 4 site retention and restoration* (a phrase regularly used but *not* acted on).

We recommend that WSCC Planning Committee refuse this application on the following grounds (see pages 2-5).

Context:

Celtique Energie, CE, applied in Feb 2013 and was granted permission to drill. In July 2016, CE was sold to UKOG. However implementing the permission did not happen until May 2017 as CE was involved in a court case with their financial backer, Magellan. The drill arrived at Broadford Bridge in May overnight breaching one of the 23 Conditions attached to the permission. The company has repeatedly sought more time amounting to almost 7 years but has not reported back on how that extra time has been used. Meanwhile, initially the drill set off in an adventurous direction, hit a fault, caused damage and the integrity of the drill failed when the cement lining did not cover the drill's entirety. Hardly a success and the finds were not "commercial". The drill was removed in March 2018 leaving an empty field, an access track and the need to restore the site as stated by the company on 4 previous occasions and now 5th occasion....*IF we find no oil we will pack up, restore the site and go.*

WELL, time is up

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Is this a reasonable request?

1. We consider it to be an un-reasonable request given the number of times the phrase has been used but not implemented.
- 1.2 The applicant has had a succession of applications to extend the period within which they have to discharge the original condition requiring site restoration by:
 - 12 months in 2017 (WSCC/052/12/WC)
 - a further 18 months in 2018 (WSCC/032/18/WC)
 - a further 24 months in 2019 (WSCC/079/19)
 - a further 24 months in 2022 (WSCC/002/22), and,
 - a *further* 24 months in 2023-4 - WSCC/046/23.

NB The company originally asked for 6 months for the actual site restoration and the extra time requested adds up to 6 1/2 years excluding the current ask.

- 1.3 The applicant has stated repeatedly that **if** they found nothing they would stop and restore the site. They have found nothing so they should go and go after they have restored the site. The original application included 6 months for site restoration, **not** the 6 years they have already had. This is the 5th request for an extension, more time made after the drill was removed and the company has stated that they found nothing of commercial value and the integrity of the well failed.....

2 **Well integrity** refers to the operator maintaining full control of fluids within a well at all times, so as to prevent any fluids escaping into the environment.

2.1 UKOG has produced a well with integrity issues and not just the washed out abandoned section or the cement repairs. The Achilles' heel of well construction operations is well known and referred to as "**the cement job.**"

2.2 **Well failed:** So, the operation of the drilling well was flawed. The cement bonding failed, and it is quite possible that the liquids including chemicals¹ put down the well got out and are somewhere underground. It was reported (RNS

¹ PROTEKT 4144; PROTEKT 4200; SAFE-COR-EN; CT-31/02WT; 4 highly toxic to aquatic invertebrates; 2 carcinogenic and some which have not been tested.

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Number 6747N, UKOG PLC, 10 August 2017) that the original well developed a washout zone, where drilling fluid was lost. That fluid will have included some toxic materials which could quite possibly find their way into our drinking water via the very faulted nature of the underlying geology in our area but that may not be known for some time.

- 2.4 This is an important point. UKOG's new plans now refer to geothermal energy BUT a key aspect of that form of energy is that it can only take place in certain areas – and this is not one of them – and, it requires a well to retain its integrity which, as we have seen, this well has already failed in that respect.

HISTORY

- 3, The geothermal potential of the UK was investigated in a programme funded by the UK government and the European Commission from 1977 to 1994 in Cornwall. This included a Hot Dry Rock experiment drilled in [Carnmenellis](#) granite in the Rosemanowas Quarry. I was employed by the local Wildlife Trust to monitor the potential impacts of the project on the local wildlife.. This project, which was never intended to produce electricity, was a rock mechanics experiment to research the hydraulic stimulation of fracture networks at temperatures below 100 °C (212 °F). 3 wells were drilled to a total vertical depth of 2.6 km (1.6 miles) where the bottom-hole temperature was around 100 °C. In 1994, the Hot Dry Rock project was closed, and research effort transferred to the European Geothermal Project in France.
- 3.1 Geothermal energy development in the UK has been limited, partly due to the lack of high [enthalpy](#) resources, but also due to the availability of cheap fossil fuels. However, when comparisons are made to countries in a similar tectonic setting, it is clear that the UK is underutilising this potential resource. The lack of geothermal development has largely been a result of the availability of North Sea natural gas during the 1980s and 1990s,
- 3.2 Interest in the geothermal energy resources of the UK rose again in the 2000s, as a potential way of addressing some of the UK's "energy gap"
4. The new proposals by UKOG are unlikely to work given the disadvantages.. They require developing in a place where such energy is accessible and this area is not one of them.
- 4.1 They can inadvertently release greenhouse gases and such energy development can run the risk of triggering earthquakes as happens in the US.

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- 4.2 It is a very expensive resource to produce and finally, in order to maintain the sustainability of geothermal energy, fluid needs to be pumped back into the underground reservoirs faster than it is depleted. That means that geothermal energy needs to be properly managed in order to maintain its sustainability a facet not associated with the operations at Broadford Bridge so far.

POLICY

WSCC/SDNP Joint Minerals Plan:

5. The WSCC Joint Minerals/SDNP Local Plan says "*As oil and gas development typically takes place over three stages (exploration, appraisal, and production), it is possible to require restoration to be undertaken at the end of each stage. This is important as it may be decided to abandon the well following the exploration and appraisal stage, as well as after production has finished.*"
- 5.1 Further planning applications would be necessary to obtain permission for a possible alternative use such as that floated by the applicant with little evidence, regarding geothermal energy.
- 5.2 **Policy M7a** (Hydrocarbon development:
"Proposals for exploration and appraisal for oil and gas, not involving hydraulic fracturing, including extensions to existing sites will be permitted provided that:
...restoration and aftercare of the site to a high-quality standard would take place in accordance with *Policy M24 whether or not oil or gas is found*"
- 5.3 **Policy M24** requires that plans "ensure that land is restored at the **earliest opportunity**". As we have seen this has repeatedly been stated but not done.
6. **CLAIMS:**
UKOG currently misleadingly lists Broadford Bridge as a 'current asset' in its *Annual Report* 30 September 2022, page 2: <https://www.ukogplc.com/> Loxley (PEDL234) Loxley/Godley Bridge gas discovery, plus Broadford Bridge-1/1z oil discovery. NB NO oil discovered of commercial interest.

AND, It also appears, misleadingly, on UKOG's its 'latest *portfolio map*' at <https://www.ukogplc.com/page.php?pID=3>

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Broadford Bridge/Loxley2 Licence: PEDL234 Interest: 100% Licence holder: UKOG (234) Ltd3 Area (km2): 300 Status: BB-1/1z oil discovery, NO OIL discovered of commercial interest. Loxley-1 gas appraisal well planning application approved on appeal.

7. EVIDENCE

7.1 The original Environment Statement presented by UKOG cited a potential 22% increase in HGVs and “No harm to local residents”. BUT a survey conducted with the oversight of a recognized Transport surveyor and local residents taking part found there to be a 67% increase in HGV traffic which had adverse impacts on the people living at Adversane and this was reported to their local Cllr Mrs Jupp and at a Billingshurst Parish Council meeting in July 2018.

7.2 The Ecological report and survey conducted at the time to accompany the original application missed out on a number of important species such as the Internationally rare Barbastelle bat mainly using the patches of Ancient Woodland and a number of red listed bird species. These records were reported to Horsham District Council and the site was dropped from the Housing allocation listing included in the Horsham DC Local Plan.

7.3 Financial situation

[Uk Oil & Gas Share Charts. UKOG Historical Graphs. Technical analysis for Uk Oil & Gas Plc Ord 0.01p \(lse.co.uk\)](#)

8. MARKWELLS WOOD, NW OF CHICHESTER, Co withdrawn from site

8.1 After a 2 year delay during which UKOG failed to comply with a condition to clear and restore their site at Markwells Wood. the South Downs National Park has to obtain a Court to get UKOG to clear the site and restore it. The site was cleared but the trees planted on it died from lack of maintenance.

KKWG recommends that WSCC refuse this application and takes up a bond as has been previously suggested at these meetings to discuss the application for an extension given the financial position of the company.

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References:

NPPF Dec 2023 Updaters: Levelling Up and Regeneration Bill, Reforms to National Planning Policy Framework, NPPF, ([link](#)) ([pdf](#) print version of HTML webpage).

- Note: For more information about the above document, please view this [post](#)

POST brief 46, April 2022, *Geothermal Energy*, UK Parliament By Dr Corinna Abesser, and, Dr Alan Walker

UKOG 2018, *RNS Number: 4634A* Oil & Gas PL11 September 2018

WP4 D4.2 January 2013 Author: Mannvit hf *Environmental study on geothermal power*

Wikipedia section on Geothermal history

WSCC/SDNP 2018 *Joint Minerals Plan* adopted in July 2018, with partial revisions (related to soft sand) adopted in March 2021.