

Ms Jane Moseley  
County Planning Team  
West Sussex County Council  
County Hall  
Chichester  
PO19 1RH



29 November 2013

Dear Jane

**RE: Planning application WSCC/083/13/KD – exploratory drilling between Kirdford and Wisborough Green**

I am writing in response to the letter submitted by Nick Herbert MP, dated 24 October 2013, to West Sussex County Council as part of its consultation on Celtique Energie's proposed exploration well near Kirdford and Wisborough Green.

In his letter, Mr Herbert described four principal concerns that have been passed on to him by his constituents. As part of Celtique's commitment to genuine engagement with the communities in which it operates, I would like to outline the steps Celtique is taking as a responsible operator to address each one of these points.

**1. Roads**

Celtique recognises that traffic is a key concern for a number of Wisborough Green residents, and we have sought to engage with the local community constructively on this issue. At our meeting with Kirdford and Wisborough Green Parish Councils on 24 June of this year, Celtique committed to again review alternative routes including those proposed by council members for the vehicles accessing the site. We also proceeded to undertake additional traffic survey work to consider the alternative route option.

However, following discussions with the highways department at West Sussex County Council we have been advised that their preference would still be for the construction vehicles to take the most direct and shortest route from the A272 via Wisborough Green. This is primarily due to the alternative route option appearing to introduce some potential safety hazard. We must take the highway authority's advice on this matter, which is why we have adhered to our initial proposed routing options in our planning application. Detail on this decision and the feedback received by Celtique from West Sussex County was provided to both parish councils in correspondence dated 17 September 2013, coinciding with the submission of Celtique's planning application.

As outlined in the transport chapter of our planning application, while Celtique's proposal will result in a modest increase of less than 3% on existing traffic levels, it is important to stress that this will be for a short period of time as detailed in the planning application. Furthermore, the traffic surveys used to determine Celtique's proposal, was undertaken by independent transport specialists at Royal Haskoning and these verify that there are already a number of heavy vehicle movements along the Kirdford Road comparable in size and scale to that associated with Celtique's development.

Regarding the volume of traffic associated with a future production scenario, it is important to emphasise that this is not a material consideration for this application, which is for exploration only.

Until such time as Celtique is granted permission to undertake exploratory drilling and secure log and core data to assess what potential if any exists within both the conventional and unconventional formations, it is impossible to say with any degree of accuracy what a future production scenario could look like. However, if results were positive (either at the initial exploration stage or following further appraisal through a separate planning application) and Celtique did bring forward plans for a production site, this would be subject to further consultation with statutory consultees and the local community and approval for a separate planning application. It is at that stage that the necessary information and evidence base will be evaluated and impacts quantified and made available for an informed and rational discussion concerning any new additional drilling or exploitation.

## **2. Nature reserve**

As part of our planning application, Celtique has undertaken a number of comprehensive ecological and wildlife surveys that have formed part of its Environmental Statement included in the planning application. This has enabled Celtique to understand in detail the ecologically sensitive areas around the site and put in place the necessary mitigation measures to minimise any impacts associated with Celtique's operations on nearby wildlife.

Prior to and during the submission of its planning application, Celtique has been in on-going dialogue with all relevant statutory consultees in this area, including Natural England, and non-statutory consultees such as the Sussex Wildlife Trust. Informed by their feedback and our own detailed Bat Roost Assessment and Bat Activity Survey, Celtique's well site has been designed to avoid illumination of the woodland edge, minimising disruption for bat activity in the area. Furthermore, noise levels will be attenuated to around 45 d(B)A at the woodland edge.

Following on-going discussions between Celtique and West Sussex County Council, Celtique is currently evaluating what additional measures may be appropriate to give the authority added confidence that its operations will have no adverse effects on the local bat population. Further information on this and associated mitigation will be available in the coming weeks.

## **3. Effect on livestock and bloodstock**

As Mr Herbert identified, some of the fields in the locality of the Application Site are used to provide grazing for horses and other animals, and horse-riding activities also take place. There are no standards for acceptable noise levels in relation to equine species; however, it is reasonable to propose that horses disregard noises in urban environments that they perceive to be non-threatening. For example, horses are frequently seen grazing at the side of a motorway at locations where the noise level can exceed 60dB(A).

The British Horse Society has guideline limits for separation distance between horses and wind turbines, although this is more concerned with visual than aural stimuli. A steady noise source such as a drill rig has little potential to startle or 'spook' an animal. Nevertheless, good site management practice will minimise any sudden noise from the drill site.



#### 4. Water

The risk of groundwater pollution at the proposed well site is low but there is scope to reduce it further by using best practice drilling techniques. As a responsible operator, Celtique is committed to taking all necessary mitigation measures to ensure against groundwater pollution as a result of its operations.

As part of site preparation, all parts of the well site will be underlain by a High Density Polyethylene (HDPE) liner placed on compacted and levelled 6F2 foundation material. In addition, all drilling fluid additives will be stored in a designated bunded area. These arrangements restrict the likelihood of spillages and leaks occurring prevent them contaminating the natural ground present beneath the drill site. In addition, the site boundaries are a ditch system that that leads to a Class 2 Interceptor so that only uncontaminated run-off water is released from the drill site area.

During drilling, several factors are incorporated into the well design to mitigate the risk of water contamination. These include:

- The use of a water-based drilling mud with non-toxic additives whilst drilling through the shallow aquifer zones;
- Control of the mud-balance such that lost circulation and invasion of the formations penetrated is minimal; and
- The very short-term exposure of the formation to the drilling mud, given that the aquifer zones are steel lined cased and cemented before drilling deeper.

Regarding the effect of drilling on the water table, Celtique recognises that water is a valuable resource. The total water requirement for the drilling operation is anticipated to be around 1,000-3,000m<sup>3</sup>, which is re-circulated during the operations to minimise the volumes needed and then disposed of at the end of the well at an approved site. The volume of water used during the drilling operation is therefore relatively modest compared to other industrial uses. Furthermore Celtique would seek to purchase the water at a commercial rate from the local water company and have it delivered to site, rather than taking it from the local mains supply.

#### 5. Site selection

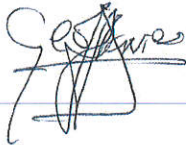
Finally, while not explicitly listed by Mr Herbert in his letter as one of the four primary concerns, Celtique notes that he and others have voiced concern over the suitability of the location of the proposed well site near Kirdford and Wisborough Green. Celtique recognises that there is likely to be a divergence of views locally as to what makes a 'good' or 'suitable' site location.

In selecting this location for a temporary well site, Celtique has undertaken a comprehensive site selection process which has taken into consideration a range of planning and environmental considerations including access and transport infrastructure, proximity to ecologically sensitive areas, and availability of existing natural screening. Further information on this selection process can be found in Celtique's Alternative Sites Assessment document, which forms part of its planning application.

It is important to reiterate therefore that Celtique has chosen this site location after an extensive and detailed selection process based on objective and stringent planning criteria. Celtique firmly

believes that this is a good location for a temporary exploration well and is hopeful that West Sussex County Council's Planning Committee arrives at this same conclusion when determining the application.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Geoff Davies', with a horizontal line drawn through the middle of the signature.

Geoff Davies  
CEO, Celtique Energie