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16th November 2018

Jonathan Ward,
Director Environmental Operations BEIS
OPRED
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Dear Mr Ward

RE: Review of the Colter Appraisal Well Environmental Statement - Report No W/4207/2017, bit.ly/2D7xgAF

We have concerns that both the proposed drilling approach, and the evaluation of the proposals have fundamental flaws including legal ones.

Legal Issues: As the Seahorse Trust has communicated to DEFRA, the Marine Management Organisation (MMO) and Natural England, the legally required Environmental Impact Assessment (EIA) was not done correctly.

The current EIA was misleading and misrepresents the risk to seahorses. Seahorses are a protected species under the Wildlife and Countryside Act (WCA) schedule 5, section 9. Specifically, designation parts 4a and 4b protect the species from disturbance either directly or to their place of shelter.

Seahorses are also a Biodiversity Action Plan (BAP) species and as such this should be considered in any possible way that might affect them or their place of shelter.

The area of the proposed Colter Oil well is a site for both the breeding and sheltering for seahorses as demonstrated through scientific surveys.

As potential threat and risk is imminent to seahorses, the European-wide Precautionary Principle (PP) should be enacted until a risk assessment is undertaken.

Given the legal protection afforded to Seahorses, these are very serious allegations and we trust that no drilling can legally occur until the facts can be clarified.

Unnecessary Risk: Given the sensitivity of this location including economic dependence on beach-related tourism, and the nearby Jurassic Coast (England's only natural World Heritage site), it is only reasonable that all possible measures would be undertaken to mitigate risk of disaster, in the event of any drilling.

While BEIS assessed that “The drilling operations are also planned to minimise the risk of any hydrocarbon or chemical pollution”, we feel this significantly misrepresents the truth. We are advised that sensible precautions must include:

- Use of a “pre-installed” capping stack so that in the event of a blowout, this could be closed almost immediately
- Use of a rotating head during the drilling operation to mitigate one of the major causes of a well control problem.
- Setting of casing much closer to the potential sand target – this provides a target for a relief well.
- Given the water injection methods employed in the nearby Wytch farm operational fields, a “pressure based” review of potential operations and very close co-operation with Perenco regarding injection pressures in any close wells.

On this point, it should be noted that the Chevron Frade incident (Brazil) was caused by pumping into one well and over pressuring a well location that was being drilled. [Chevron refutes Brazilian regulator’s spill report | Oil and Gas Technology](#)

Oil and Water Don’t Mix: It should be noted that the nearby Wytch Farm, often cited as an example of the UK’s gold standard of the oil regulatory system has indeed suffered several incidents. For example, on 9 March 2013, 13,600 litres of crude oil and produced water was released as a spray that covered 10,800 meters of land. <http://www.documentcloud.org/documents/1357172-> Given UK and worldwide events that prove the risk of accidents is ever present, we wish to highlight again that the implications of an accident offshore at this site are extremely serious and plans must not be allowed to fall short, as they have done to date, of the highest level of scrutiny.

We trust that our concerns will be given your urgent attention and we respectfully await your response.

Yours Sincerely,

Stuart Lane – Fossil Free Dorset

Sara Goldsmith Pascoe - Save Our Shores

Neil Garrick-Maidment FBNA-The Seahorse Trust

CC

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Molly Scott Cato MEP - South West and Gibraltar

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Sir Christopher Chope OBE MP - Christchurch
Cllr Simon Bull – Bournemouth Borough Council
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