

# Puddletown Well – Brief for Objectors

## Application for exploratory oil drilling on land next to Athelhampton Road DT2 7LJ

Application Ref: WD/D/19/002866

The applicant – South Western Energy Ltd – made an original proposal for a vertical, conventional oil well off the A354 near Athelhampton – in December 2019. The application was for a pilot production well and 20 years of production. The oil was to be transported by 8-10 HGVs a day to the Fawley Refinery over 80 kms away. They were asked to provide various follow up documents including a Climate Change Assessment, an Ecological survey, a Heritage assessment, and a Hydrological survey and report. These can all be found here <https://plan.dorsetcc.gov.uk> - look for the documents dated 2022.

Comments are now invited on those new documents with a deadline of February 9<sup>th</sup>.

Below are some pointers – please do submit comments in your own words. It can be as short or as long as you like. If you're objecting be clear that you object throughout and that you are asking for the application to be refused.

### Risk to Groundwater

- The applicant says its plans pose a low risk to the groundwater and has failed to carry out a proper Hydrogeology Risk Assessment. An independent assessment should be carried out.
- The chalk water catchment area is particularly vulnerable to contamination, for example from leakage or spillage of industrial chemicals and petroleum hydrocarbons. These are known risks:
  - Contamination of soil and surface water by runoff from construction activities, spills and leaks of drilling muds, and/or from poorly managed wastewater or handling of chemicals
  - Contamination of groundwater by pollutants (including gas) released from the well due to well integrity failure, spillage of stored wastewaters and/or chemicals
  - Risk of production fluids migrating through natural fissures in the rock (which can be exacerbated when accompanied by seismic events) into groundwater supplies.

### Climate Change Assessment

- Policy CC1 of the Bournemouth, Dorset and Poole Minerals Strategy states that “Proposals for mineral developments and aggregates recycling operations should be supported by an assessment of how climate change mitigation and adaptation measures have been incorporated in the design and operation of the proposed development and considered in its location. This assessment will include demonstrating that the proposals are energy, material, and water efficient. It must also demonstrate how emissions generated from traffic will be minimised.” The application as submitted does not include such an assessment.
- The Climate Change Assessment does not quantify, estimate or propose how to mitigate the methane and other greenhouse gas emissions arising from the project.
- It makes unsupported claims that oil from this site would have a smaller carbon footprint than imported oil
- The applicant cannot guarantee that any oil produced would substitute for potentially more carbon intensively produced oil from abroad – nor can the Mineral Planning Authority put a condition on any permission that it should.

- There is no guarantee this oil would be used in the UK. Whilst the UK has been a net importer of oil products since 2013, we still export thousands of tonnes of oil products a year.
- Based on our estimates, the combustion of 20 years of oil production from this site at the rate given of 1760 barrels per day could give rise to over 5.5 million tonnes of carbon dioxide and other greenhouse gases.
- We do not need more oil from Dorset to provide us with energy security.
- UK Energy Policy does not support the expansion of onshore fossil fuels – its focus is on offshore.

For more information on the lack of need for onshore oil from the UK please visit:

<http://www.wealdactiongroup.org.uk/2020/10/new-briefing-briefing-why-we-dont-need-more-onshore-oil/>

### **Planning permission needed for each phase of the project**

- SWEL has applied for permission for 20 years of oil production. The local Minerals Strategy and the National Planning Policy Framework require Minerals Planning Authorities to clearly distinguish between, and plan positively for, the three phases of development (exploration, appraisal and production)". This application fails to do that as this application starts with production, not exploration. These separate phases each require planning permission.

### **Methane**

- Oil production from this site could lead to 4 million tonnes of methane being vented at the site - this is in addition to the carbon emissions from the combustion of the oil and from operations on site. SWEL has no plans to prevent unabated venting of methane and other volatile organic compounds that will arise from exploration and production. The application is therefore incompatible with the industry (Oil and Gas Authority) requirements and this needs to be addressed through the Climate Change Assessment, which should propose mitigation of this highly polluting gas.
- There are methods for avoiding unlit flares and it's possible to eliminate the need for a constant pilot. For example, there are auto-ignition systems (which require a power source, or at least a battery to create constant spark). However, SWEL has not listed any of these options.
- SWEL has not presented a leak detection and repair (LDAR) plan.

### **Oil tankers**

- The Climate Change Assessment should provide an assessment of the climate impacts of the HGV and other traffic movements to and from the site – it fails to do this
- It talks vaguely about the option of a pipeline but fails to go into details of it or to provide any assessment of the environmental, including climate, impacts of that option. That option should be part of the plans for the site if it is a viable mitigation measure so that it is properly assessed at the outset.

### **Road access**

- As the Climate Change Assessment talks about the access to the site it would be timely to raise again concerns about the proposal to use a narrow access way which is mostly covered by a bridleway designation. This brings HGVs including a drilling rig into potential unsafe contact with bridleway users and farm traffic
- There is also the issue of slow moving heavy vehicles pulling out or turning into the access track from the A354, which carries fast moving traffic.