

Via email: Title: Referenced copy of letter from Frack Free Misson

Dear Councillor,

You may be aware that IGas Ltd. are intending to apply for an extension to their planning permission for shale gas exploration at Misson Springs in Nottinghamshire. The company drilled one vertical exploration well at the site in 2019 but now wish to extend their tenure by three years in order to meet site restoration commitments. Frack Free Misson regard this to be an attempt to manipulate the planning system on speculative grounds outside the purpose and intent by which the original permission was granted.

In November of 2019, the government imposed a moratorium on fracking for shale gas in England following excessive induced seismicity from Cuadrilla's operations in Lancashire. The Oil and Gas Authority (OGA) concluded that it was not possible with current technology to predict accurately whether fracking would cause tremors nor how big they would be.

However, this measure is pro-tem, and not exhaustive; hydraulic fracturing can feasibly still be carried out on shale gas wells as 'exploration,' under the terms of planning practice guidance. All shale wells fracked in the UK to date have resulted in excessive seismicity and suspension of operations.

The trade body United Kingdom Onshore Oil and Gas (UKOOG) estimate that to reduce UK net gas imports by 50% over 15 years would require 100 well pads with up to 40 wells on each. That equates to drilling and fracturing 5 wells per week.<sup>1</sup>

In order to appreciate the potential impact on Nottinghamshire, one has to realise that approximately 25% of the shale gas licensed areas in England cover some 60% of our county. The majority of these areas are coincident with abandoned mine workings and the Sherwood Sandstone aquifer.

This presents a very real and significant risk to our communities and environment, due to the extensive legacy of compromised geology from coal mining. This issue was addressed by Frack Free Misson in the recent Planning Inspector's hearing for the new Nottinghamshire Minerals Plan, by which we called for stringent controls to be applied to any proposed fracking operations near mine workings.<sup>2</sup>

Previous assertions regarding the UK's future energy security used to justify shale gas development have been proven unfounded. Contrary to former industry claims, the government's 2017 Gas Security of Supply report stated that future energy security will not be dependent

The energy case for shale gas is a decade old, and does not reflect the pace of change.

Between 2012-2017, new gas electrical generation predictions fell from 25 to 5 GW.<sup>4</sup>

2017 renewable energy forecasts were up 71% on 2015 figures.<sup>5</sup>

BEIS 2019 Projections show Gas generation dropping by 30% in the next three years, from 33 to 22% of total.<sup>6</sup>

upon new indigenous sources such as fracking.<sup>3</sup>

The industry is now making unsubstantiated arguments that fracking will be beneficial in the move to a zero-carbon economy, by reducing emissions arising from the processes of importing gas. In 2018, this argument was effectively removed from the National Planning Policy Framework by a High Court ruling that the government had been selective in its consideration of evidence.<sup>7</sup>

In addition, the Committee on Climate Change have stated that any reduction in emissions by following such a strategy would be minimal<sup>8</sup> It is of note that UKOOG's projections are for the reduction of 'net' gas imports; any gas produced will belong to the well site operator, who would be free to trade it as they see fit.

16th January 2017. Letwell Village Hall, Rotherham.

Question: "Can you guarantee that you won't export the gas?"

Reply: "We are a commercial company."

Gary Haywood, (now ex-) CEO of Ineos Shale.

Whilst 'nodding donkey' oil pumps may be an established feature in fields of Nottinghamshire, there is little similarity with the scale and intensity of shale gas extraction. To maintain commercial viability, high volume hydraulic fracturing for shale gas has to be completed at scale and speed. Whilst conventional wells may remain commercially viable for twenty or so years, the productivity of fractured shale wells can fall 65% in the first year, and around 85% over three years. There are two options to overcome this; either repeatedly frack the wells, or simply drill more.

UKOOG's ambition detailed above is based upon a simplistic 2014 business model from the Institute of Directors.<sup>8</sup> This was built on the premise that the UK geology was suitable, which has repeatedly been proven not to be the case.

Also, the same report summarily dismissed the planning system as a 'major barrier to development' without recognition of its purpose, or function, in protecting public health through sustainable development. Instead it was purported that planning for shale gas 'should be streamlined with clear guidance and direction from central government. 'Moves to achieve this were roundly rejected in 2018 by mineral planning authorities, including Nottinghamshire County Council, and have now been shelved by government.

The profiteering purpose and intent of the fracking industry is clear, yet its futility and lack of integrity is becoming more evident with time. The OGA have stated that with respect to the moratorium, "the research proposed thus far by industry would be insufficient to satisfy us that associated hydraulic fracturing could take place consistent with the government's policy aims."<sup>9</sup> The fact that *proposed research* fails to indicate progress shows that this latest attempt by IGas to 'mothball' the site at Misson Springs is simply a speculative ploy in pursuit of a lost cause.

Frack Free Misson believes that notwithstanding current Covid restraints, the site restoration condition should be met in full forthwith. We respectfully urge you to pursue this outcome in order to protect Nottinghamshire's communities and environment and as a positive step towards a sustainable and truly low carbon future.

Your Sincerely

Frack Free Misson.

## References:

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End.