

# Guidance for responding to Cuadrilla's application to vary Environmental Permit at Preston New Road – July 2017

## Details of the application

Cuadrilla Bowland Ltd permit for Preston New Road, PR4 3PJ

Permit number **EPR/AB3101MW/V003**

Environment Agency consultation page: <https://consult.environment-agency.gov.uk/psc/pr4-3pj-cuadrilla-bowland-limited/>

The closing date for comments is **Thursday 3 August**.

## What are Cuadrilla applying for?

Cuadrilla have planning permission to drill and frack up to four wells at Preston New Road. Alongside planning permission for the site, Cuadrilla need an Environmental Permit in relation to certain parts of the drilling and fracking processes. (An explanation of the legal aspects of planning and permitting are here: [https://www.foe.co.uk/sites/default/files/downloads/fracking\\_faqs.pdf](https://www.foe.co.uk/sites/default/files/downloads/fracking_faqs.pdf))

Cuadrilla are applying for variations to the Environmental Permit they have been granted from the Environment Agency. Should these variations be granted it could mean that Cuadrilla are able to intensify their fracking activities at the site, which could have knock-on implications for impacts such as noise, waste and flaring.

## How to respond

You can respond to the application:

- online through the EA's website on the consultation page (link above)
- by email to: [PSCpublicresponse@environment-agency.gov.uk](mailto:PSCpublicresponse@environment-agency.gov.uk)
- or in writing to:

Environment Agency  
Permitting and Support Centre  
Land Team  
Quadrant 2  
99 Parkway Avenue  
Sheffield  
S9 4WF

## Key points and implications of the application

Friends of the Earth have reviewed the key documents associated with the application for variations – which are accessible here: <https://consult.environment-agency.gov.uk/psc/pr4-3pj-cuadrilla-bowland-limited/> – and have summarised some key points you may like to make in a response to the Environment Agency.

## Lack of clarity

A key point is the lack of clarity of Cuadrilla's application. It is not clear whether they want to move away from the indicative timeline set out in the 2014 Environmental Statement. It seems that they want to speed up and intensify the drilling and fracking process, but they don't say this explicitly or explain why they want to do this.

It would be much easier to understand and respond to the application if Cuadrilla had been clear about the need to intensify the drilling and fracking process, and the implications for the timeline they have set out for the site.

## Intensification of fracking at the site

Cuadrilla are asking the EA for permission to **intensify** their fracking activities at PNR.

The existing permit allows Cuadrilla to do **one** fracking stage per day (765 cubic metres is the quantity of fluid Cuadrilla say they need for **one** fracking stage)

The variation Cuadrilla are applying for will allow Cuadrilla to do multiple fracking stages per day.

It is not clear whether Cuadrilla:

- a) want to do more than one fracking stage per day at a single well; OR
- b) want to frack more than one of the four wells on site on a single day

If Cuadrilla want to frack more than one well on the same day that would represent a significant departure from the timeline set out in the Environmental Statement (which said that the four wells on site would be fracked consecutively one at a time).

### **Changing the sequence of activities at the site**

It appears that Cuadrilla wants to change the sequence of activities shown in the indicative timeline in Figure 4.2 of the original Environmental Statement which is to drill then frack each well consecutively (i.e. drill well 1, frack well 1, drill well 2, frack well 2 etc.)

Cuadrilla may now want to drill more than one well before fracking. This is shown by their proposals for seismic monitoring during fracking: instead of burying a micro-seismic array to do the monitoring, they say on p14 of the new Waste Management Plan ([https://consult.environment-agency.gov.uk/psc/pr4-3pj-cuadrilla-bowland-limited/supporting\\_documents/Waste%20management%20plan.pdf](https://consult.environment-agency.gov.uk/psc/pr4-3pj-cuadrilla-bowland-limited/supporting_documents/Waste%20management%20plan.pdf)):

*Monitoring of fracture growth will be captured by the temporary installation and operation of downhole micro seismic geophones (sondes). The approach of **drilling multiple wells before hydraulic fracturing** subsequently means that an offset well, i.e. the well next to or in close proximity (on the same pad) to the well which is about to be hydraulically fractured, can be utilised to locate micro seismic geophones for the monitoring of fracture growth.*

### **Potential environmental impacts of intensification and a change to the sequence**

#### **Noise**

If Cuadrilla are planning to change the order of drilling and fracking this would change the noise profile of activity.

If two wells are worked simultaneously, e.g. one being drilled while the other is fracked, this could increase cumulative noise and potentially mean noise levels (free field) that go beyond the current daytime (55dB LAeq1hr) or night time limits (39dB LAeq, 1hr or 57dB LAmx) re. planning condition 29.

It is worth noting that drilling, as well as flowback testing are allowed at the site 24 hours a day; so the potential for impacts on the lower night time limits could be possible as a result of multiple drill works. There must be close scrutiny of the noise monitoring data to ensure no breaches.

In addition to the above, there is also potential for increased incidences of impulsivity, e.g. "higher noise 'spikes' produced by transient or impulsive noise" (as set out in the Environmental Statement). Planning condition 30 (of the planning permission) requires monitoring for such spikes, and therefore the potential for knock-on effects regarding changes to the Environmental Permit must be taken into account.

In summary there are potential implications for noise as a result of the permit variation which are relevant to the scheme's ability to comply with its original planning conditions, and the EA must give this risk full weight in making its decision.

#### **Waste**

Whichever form of intensification Cuadrilla are proposing we are concerned about the impact on waste.

The Environmental Statement said that up to 1750 cubic metres of waste flowback fluid could be produced each week at PNR which would need to be transported off site for treatment. The ES said this would take up 65% of the UK's treatment capacity and would have a very substantial and significant impact on capacity. All these figures were based on Cuadrilla doing one fracking stage per day.

As Cuadrilla now wants **to intensify** fracking by doing more than one fracking stage per day, we believe that raises questions for Cuadrilla about the amount of waste flowback fluid that is going to be produced and the transport movements that are going to be required to take the waste off-site.

## **Flaring**

The existing permit allows Cuadrilla to flare gas for 90 days for each of the four wells on site. The variation Cuadrilla are now asking for would allow them to flare for 360 days across the whole site.

Although Cuadrilla aren't proposing to vary the existing daily flaring limit of 130,000 cubic metres of gas, the new permit would give Cuadrilla much greater flexibility around flaring (for example allowing them to flare gas from a single well for much longer than the 90 days currently allowed by the permit).

It would be much easier to understand the rationale for the proposed variation if Cuadrilla had been clear about their proposed timeline for the site. There are questions for Cuadrilla about the practical implications of permitting 360 days of flaring across the site.

*Ref.* Link to the Environmental Statement 2014 for Preston New Road (i.e. the assessment of impacts that the original planning and permit applications have been based on) – please note this is a very large document <https://cuadrillaresources.com/wp-content/uploads/2015/02/PNR-ES.pdf>