

David Langley; plot 62, Milton Piece allotment , shared with my wife, Viola Langley.

"The never-ending challenge of avoiding inadvertent release"

At Ex.Qu.'s 2 the applicant was asked a simple question- would allotment holders be able to work on their plots during HDD operations?

Aquind's answer was , Yes, even when we were working directly above the drill.

My question is ; Can we trust their judgement?

In fact it is the judgement of a specialist contractor, who supplied specification sheets, covering products used as lubricants, containing Bentonite- more of this later.

Best practice of HDD operations requires an emergency procedure in the event of what is called by the applicant a Bentonite breakout, globally known as an IR or inadvertent release ( of drilling fluids).

Will we experience an IR at the allotment? Aquind says it's a small risk. If so, they/their chosen contractor will adopt their published plan.

Implicit in the plan is the possibility of an IR; that is, drilling lubricant will escape to the surface from beneath. It is subject to very high pressure after all. They are carrying out hundreds if not thousands of feet of this drilling. I have been concerned about this possibility since Aquind's reassurance about access. I find it difficult to trust this judgement. The HDD industry recognizes that IR's are unavoidable - there is even a second tier to the industry, specialising in clearing up after IR's.

The contractor appointed by Aquind , however, appears to have an in-house team, charged with dealing with IR's. No doubt, they will follow best practice as outlined in , eg , Geosyntex's publication " Comprehensive Approaches to mitigating inadvertent release of HDD".

This publication offers mitigation options if an IR occurs eg "install relief wells to provide a preferential pathway for drilling fluids to migrate to the surface" or " use special drilling fluids" or "select an alternative installation method".

Well, that's sorted then, very reassuring.

Furthermore " the IR mitigation plan must include emergency response and clean-up procedures....but an emergency plan alone does not constitute a comprehensive approach to mitigating IR's"

So, what of Stockton's documents/ Aquind's submission in relation to this? Might special drilling fluids be introduced should things turn nasty under the allotments? What is special or makes this fluid special? Seeking independent information I wrote to companies who offer HDD and to manufacturers /suppliers of drilling fluid. This is what I asked, in summary:- whether they could guarantee the safety of personnel working in a garden setting directly above HDD operations- whether products used in HDD might safely be ingested - whether plants for human consumption could be safely grown in soil contaminated by all types of drilling fluids. I received only one reply, and that from Stockton.

They referred me back to Aquind. So much for independent information. I hadn't even mentioned Aquind in any communications to these companies yet my private enquiry ended up with the Applicant.

Reading numerous sources online has lead me to the conclusion that " polymers" maybe necessarily be added to drilling fluid as required . Is this the "special fluid"? Can this be safely ingested?

So, now what?

I assume we can expect an IR - the contractor does, his team will be deployed. What about our young granddaughters caught up in such an event? Or our neighbour's dog? What about the newts, slow-worms, lizards, small rodents, frogs, bugs etc which abound in this environment? What if a small child or dog slips on this liquid emerging under pressure onto the surface? - the product is notoriously slippery according to the spec. sheets. What if a child , having slipped over, ingests some of this special drilling fluid -or the dog- or any of the other living organisms which abound in this fertile environment.

It doesn't bear thinking about it.

Whilst on the subject of IR's, I'd like to draw to the examiners' attention one incident, recorded in the International Pipeline Conference records, Year2000, Volume 1. A case study- Environmental Considerations of HDDs. I'd like to highlight 2 of the 4 IRs which occurred during a bog-standard HDD operation under wetlands.(excuse the pun)

1)Following best practice, after an IR "Fluid was quickly confined with silt fence and hay bales then pumped and/or removed with hand tools". However ,months after this clean-up, a 2 to 6 inch layer of contamination remained. An area of approximately 8,000 sq. feet was affected.

2) Drilling fluid escaped from an IR and combined with the substrat material, solidified into a solid layer up to 12 inches thick. After normal, best-practice measures, heavy machinery had to be brought in to break out some of the accessible material. Even so, in places, layers 2 to 8 inches thick remained. And this over an area of approximately 30,000 sq. feet.

Relate this to the allotments and you will understand my concern. It is easy to dismiss the risk if you are a contractor who ultimately will use whatever it takes to get the cables under or through the allotment area, on time and in budget. Easy to dismiss if you are indifferent to the potential harm to a child , pet or flora and fauna. Imagine the scene- distressed allotment-holders who, don't forget, are permitted to access their plot at all times, are asked to step aside by the IR team so that whatever works or equipment are brought onto site to deal with the mess.

It doesn't bear thinking about.

Then there are the drainage issues. Milton Piece is continually affected by inundation, whether from heavy rainfall or very high tides and adverse wind effects. The Aquind HDD plan would drive 6 non-absorbent ducts through the land, displacing natural, more drainage-friendly material. Can we expect a beneficial effect from this? I don't believe so. More flooded plots, taking longer to drain.

So dear examiners, please protect our grandchildren, protect our pets, flora and fauna and don't forget the hundreds of allotment users whose lives depend on this wonderful resource. Recommend

that the Applicant takes his cable project elsewhere, looks elsewhere to make his vast unjustified profit. We don't want it, don't need it and won't have it. Don't risk our safety, our future.

**From:** [REDACTED]  
**To:** [Aquind Interconnector](#)  
**Subject:** additional submission David Langley  
**Date:** 25 February 2021 18:05:46

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Dear Examiners ,

I have always doubted the veracity of the optioneering process used to identify Lovedean as the preferred connection point into the National Grid.

In the applicant's alternative schedule there is a diagram that shows the initial thinking to a landfall somewhere generally North of Le Havre has meant that Ninfield to the East of the schematic shown in the Environmental statement page 13 of 80 was excluded from consideration.

<https://eepublicdownloads.entsoe.eu/clean-documents/tyndp-documents/TYNDP%202016/projects/P0247.pdf>

A simple glance at any map of the area shows, that once the French side of the project is resited near Dieppe Ninfield becomes the obvious connection point. This obviates virtual all the objection issues posed by selection of Lovedean with landfall at Eastney. Although late in the day I propose that the current application for DCO be refused on the grounds that the optioneering process seriously failed in its duty to be diligent.

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN020022/EN020022-000570-6.1.2%20ES%20-%20Vol%201%20-%20Chapter%202%20Consideration%20of%20Alternatives.pdf>

## 6.1.2 ES - Vol 1 - Chapter 2 Consideration of Alternatives Final

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I trust this will help the examiners in their deliberation.

Regards,

David Langley