National Infrastructure Directorate

Bristol BS1 6PN

30 May 2012

Your ref EN030001

My ref [redacted]

Dear Sir

Please find enclosed my representation regarding the proposed Underground Gas Storage Facility at Preesall Saltfield, Lancashire Reference Number EN030001.

If you require copies of the documents to which I have referred, please contact me and I will send them to you.

Yours faithfully

[redacted]

Rosemary Hogarh
I, Rosemary Hogarth was born in Preesall and have lived in Preesall for most of my life. With help from my great uncle Harold Daniels, the last surviving Preesall salt miner who died in 1988, I wrote the History of the Preesall Salt Industry in volumes 1-5 of the Over Wyre Historical Journal published by Pilling and District Historical Society.

In 1926, rather than having to keep paying out compensation for subsidence as a result of the salt industry, the United Alkali Company bought the smallholding where I now live from my great, great aunt.

The Preesall/Stalmine layered salt, with its geological faults, wild brine, existing subsidences, extending subsidences, unpredicted subsidences and predicted future subsidences is obviously unsuitable for the storing of gas.

Even in areas suitable for storing gas, however closely monitored, there is always the possibility of human error. Human error was the cause of some of the disasters in America, and I remember that in 1984, when I helped with the ICI Hillhouse Centenary of Preesall Salt Exhibition, it was a “joke” that ICI had stored ethylene in a salt cavern in Teeside and lost it. Put the combination of storing gas in unsuitable ground, with the possibility of human error, in an area of high population density and you have the recipe for a national disaster.

I am very concerned that Halite seem to ignore evidence of danger and take the attitude that it will be safe because they say so. For example look at the area between Higher Lickow farmhouse, Back Lane and the former Agglebys farmhouse. This contains, among others, Brine Wells 45, 46, 50 and 51.

The ICI 2002 Dipping Hooking and Surveying Programme, 2001 Preesall Site Survey Dipping and Hooking Report by Graham Veal 02/05/02 states regarding BW 50 that “the floor has risen 5m in the last 12 months.....the overall trend of this cavity at present is to surface. With the continued deterioration of the roof, the likelihood of a total collapse is very probable and fencing off this area is recommended. Consideration must be taken into account of the farmhouse in the vicinity as collapse will significantly affect the property (ref well 88- although it can take up to 30 years for collapse to occur)”. This was why when the last tenant of Higher Lickow farmhouse died late in 2001 and his widow moved out in 2002, ICI did not re-let the farmhouse.

BW54 and 51 were forced brine wells like BW52 and 53 south of Agglebys farmhouse. Forced brine wells were worked in pairs. Water was forced down to the bottom of the lining tubes of one well of each pair and the brine, made by the water, came up the adjoining well from the bottom of the rock salt bed. If the connection was by way of the rockhead, the result was subsidence. FJ Thompson, former Manager of Works for the United Alkali Company, wrote in “An account of the salt deposits at Preesall-Fleetwood and their development” May 1927, pages 35 and 36, “No 51 and 46 (192 feet apart) in which the water goes down No 51 and the brine comes up No 46. In December 1920 these two wells
had together yielded 230,000 tons of salt and there are no signs of surface subsidence. The other case of connection of wells is that of Nos 52 and 53 (200 feet apart) which two wells together up to December 1920 had yielded 455,000 tons of salt and so far no signs of surface subsidence. Until surface subsidence takes place at either of these two pairs of wells, we cannot form any opinion as to the advisability or otherwise of putting down other wells adjacent to them.” BWs 52 and 53 did subside and the subsidence is still increasing. Agglebys Road has fallen into the subsidence and the farmhouse has been pulled down. BWs 46 and 51 are the only forced brine wells that have not yet subsided.

Halite know about the dangers of BWs 50, 46 and 51. Yet they chose to site the heavy haul road, gas pipes and electrical supplies through this area of land. They know that ICI deemed Higher Lickow farmhouse unsafe for habitation. Yet they chose to make Higher Lickow farmhouse their headquarters and they approached Myerscough College with the suggestion that students be involved with the creation of an educational unit at Higher Lickow Farm as reported in the Garstang Courier 22/02/12.

They did not know that BW 45 would blow out on 18/06/2011 but their response to it was not very reassuring.

I repeat that I am very concerned that Halite ignore evidence of danger and seem to believe that it will be safe because they say that it will.

Rosemary Hogarth

Registration ID ****