THE INFRASTRUCTURE PLANNING
(Examination Procedure) Rules 2010

Preesall Underground Gas Storage Facility, Lancashire

Brief Response to PWG Statements at Open Floor Hearing on 17th October 2012

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RESPONSES TO PWG

PWG raised a number of points at the Open Floor Hearing on the 17 October 2012. Those points are largely matters raised previously by PWG, and responded to in detail, by Halite during the Examination. It is not necessary for Halite to respond to each and every point in the PWG statements, but Halite sets out a brief response to certain issues raised by H Phillips and M Clegg, below:

Howard Phillips’ Statement

1.1 General Geology Issues (2.1 PWG statement)

The technical issues of wet rockhead, seismicity, subsidence, fracking and legacy brine wells have been addressed within the GSR (Doc 9.2.2) and its supporting documents.

1.2 3D Geological Model (2.2-2.3)

1.2.1 PWG have reiterated many of their points made during the Examination, and often refer back to previous planning applications on the Preesall site. Significant developments in the design and the geological data have been made since the previous planning applications. The points raised by PWG have been addressed by Halite, in particular, in the Geology Safety Report (‘GSR’) (Doc 9.2.2 and its supporting documents) and in the responses to the Local Impact Reports, the Relevant Representations, the Written Representations, The First Inspectors’ Written Questions, The Further Inspectors’ Written Questions (Halite documents H3, H5 and H8).

1.2.2 It is worth repeating that the geological model was initially prepared in 2005 by the BGS, the foremost geological authority in the UK which has experience of gas storage projects in other areas of the UK and has prepared reports for the HSE on the safety of gas storage. This model was updated by the BGS following the Canatxx Public Inquiry decision and included within the geological reports detailed in the GSR. In addition the model was completely reviewed by Dr E Rutherford, an international gas and oil geologist, who derived safe areas in which to place caverns based on the updated BGS model and additional information.

1.2.3 This interpretation of the model and hazard zones was reviewed by Mott MacDonald in preparing the GSR. Prof Rokahr, an international expert in salt cavern design and construction, has reviewed the additional data and the model and concluded that the salt was capable of safely storing gas. Contrary to what PWG claim, the geological model has undergone extensive scrutiny and verification by leading geology experts since the Canatxx Inquiry. This informed the identification of the polygons proposed in the DCO application. PWG has not provided a substantive explanation as to why they consider Prof. Rokahr’s conclusions to be unsound. PWG apparently accepts the point made by Halite that a number of similar schemes within the UK have received planning permission without any significant seismic surveys or boreholes within the proposed storage areas, and with significantly less geological information than Halite presents in support of this application.

1.2.4 Finally Atkins, the technical advisors to LCC, which had opposed all the previous applications on geology and safety grounds, have reviewed the current proposals and have advised LCC that sufficient information on geology has been provided, at this
stage, to demonstrate that the current proposals could safely be accommodated. This advice was accepted by LCC, as reflected in the Statement of Common Ground ('SoCG') concluded between LCC and Halite on geology and safety matters (SoCG 1). WBC endorsed the position of LCC as set out in those SoCGs (see also WBC Local Impact Report 11.2). Whilst the two local authorities had previously objected to proposal on the Presail site for reasons concerning safety and geological unsuitability, those objections are no longer raised.

1.3 Faulting (3.1-3.3)

PWG reiterate their arguments made during the Examination regarding faulting. Subsequent to the Canabxx Inquiry, the BGS has produced specific reports on faulting (CR/09/038). Faulting was also comprehensively reviewed by Dr Rutherford, the results of which were included in the GSR prepared by Mott MacDonald. Specific aspects raised by PWG on faulting were addressed in Documents H3, H5 and H8 which were prepared with the assistance of both the BGS and Dr Rutherford.

1.4 Northern Polygon (3.4-3.5)

The geological model is based on a seismic line within the polygon, and boreholes within and at its margin, and nearby. The final volumes and cavern depths will be decided at the detailed (pre-COMAH) design stage and will take account of a number of factors, not only the top salt level.

1.5 Additional Data (4.1-4.2)

As stated in Halite’s Examination documents, there is sufficient detail at this stage for the Secretary of State to be satisfied that the proposed development can be accommodated within the Presail site. Additional information will be gained and added to the model prior to cavern construction. It is usual to undertake these project specific surveys when the design is more fully developed, and an iterative process is to be expected. The detail of the types and locations of further surveys will depend upon the judgement of experts in the design team and the views of the Competent Authority, in order that the necessary detail for matters such as geological assessment, salt properties and overburden properties is obtained for cavern and casing design.

1.6 Depth of Workings being the shallowest in the UK (4.1)

The Hole House scheme in Cheshire is in salt which is only at a depth of 185m with top of caverns from 240m depth. This is at a shallower depth than proposed in Presail, contrary to PWG’s assertions

2 RESPONSE TO MALCOM CLEGG STATEMENT

2.1 Fire protection and safety issues are part of the COMAH approval process.

2.2 As previously explained, the detailed design of the facility has not yet taken place, and in advance of the COMAH approval process no decision has been made with respect to the nature and distribution of fire fighting equipment. It is likely that there would be firewater pumps, both electric and diesel, with a fire ring main around the Gas Compressor Compound (GCC). As stated in Halite’s July 2012 response to PWG (document reference H3 para 3.152), Halite is not aware of any gas storage facilities that had water curtains provided at the wellheads. The COMAH Competent Authority may or may not require that they are installed.
2.3 There are no separation distances or exclusion zones in the COMAH process. As is now well understood from the Examination process, the Wyre Way public right of way does not pass through a prospective COMAH site at this location because the wellhead compounds and the GCC will not constitute one continuous COMAH site. As part of its response to the consultation on the application for deemed Hazardous Substances Consent, the HSE has concluded that there is no unacceptable risk to members of the public from the cavern positions, wellhead compounds, or GCC.

2.4 When emergency plans are developed in conjunction with the Competent Authority, as part of the COMAH process, LCC and the local emergency services will be consulted as to what warning signs and other measures should be employed to warn the public. Contrary to the assertion that the Preeoall site has no secondary emergency access, as explained in Hallie’s Response to PWG (doc H3, 4 July 2012, at 3.153-3.155) there is a secondary emergency access to the site, from the north passing close to Cote Walls Farm.

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19 October 2012