Dear Minister,

I enclose emails from Howard Phillips and Ian Mulroy who lead the Protect Wyre Group, which objects to the Halite planning application for a gas storage facility under the River Wyre.

Messrs Phillips and Mulroy are concerned that the applicant has not taken into account faulting at Barnaby Sands when assessing the possible volume of gas which could be stored in the caverns. They contend that the faulting would reduce the capacity to around 100mcm.

I should be grateful if you would ensure that the faulting at Barnaby Sands is taken into account when the application is considered.

Yours sincerely,
Ben Wallace MP,  
Wyre and Preston North Constituency  

Howard Phillips,  
66 Lawsons Road,  
Thornton FY5 4DD

29th May 2015

Dear Ben,

Re: Halite application for gas storage at Preesall

I would like to support the e-mail which Ian Mulroy has recently sent to you regarding our concerns that the problem of faulting under Barnaby’s Sands has not been taken into account when assessing what volume of working gas can be stored and what infrastructure would be required. As Ian says, Halite’s consultants are suggesting a total volume of working gas of 324 mcm, whilst the DECC Consultants Senergy indicate just over 200 mcm which is well below the 300 figure required by the IPC.

But neither Halite nor Senergy address the issue of faulting. In its application Halite was careful to avoid the major fault lines which run across the salt basin and sited its 19 caverns so that the minimum distance of any cavern to a fault was at least x3 the radius of the cavern.

My analysis of the new seismic lines and the revised 3-D geological model is that a number of the caverns would be far too close to the faults now revealed in the model. In the PWG submission to DECC (9th September 2014) following the publication of the Senergy Report, it is suggested that the juxtaposition of caverns and major faults could reduce the working gas volume to 100 mcm, possibly a maximum of 150 mcm. Several of the caverns could not be constructed for safety reasons which would in turn have an effect on the surface infrastructure.

Halite seeks to obfuscate the issue (see H44) by attempting to concentrate the focus on injection and withdrawal rates and by rubbish the independent Senergy Report.

I trust that the DECC are all too aware of this strategy and that it has no option but to accept its own consultant’s findings and to factor in the issue of faulting as demonstrated by PWG. There is no way that 300 mcm of working gas can be stored given the new information provided by the 2013 seismic lines and the DECC should confirm their previous decision to refuse the application.

Yours sincerely,

Howard Phillips  Vice-Chair PWG
Hi Ben

Howard and I have been studying the various geological reports which form the DECC decision and there is great concern that neither Halite or Senergy have taken faulting at Barnaby Sands into consideration when determining the possible volumes of stored gas.

We need to do a bit more reading to try to tie everything together but basically the Inspectors wanted to see at least 300mcm of stored gas and Halite immediately dropped their claim of 600mcm to 324mcm – suspiciously just enough to meet the criteria – and if unproven would this invalidate the judgement from Mrs Justice Patterson?

Senergy did an independent evaluation for DECC and came up with just under 200mcm which they have revised to just over 200mcm which is still short of the 300mcm target.

Neither party takes any account of the faulting in the salt layers at Barnaby Sands which we contend could reduce the actual volume stored to about 100mcm.

Can we in any way make sure the DECC have fully considered the faulting as it doesn't appear anywhere in their documentation.

We are concerned that a decision could be announced imminently and we don't want it to be made on the basis of unconsidered information.

We are also trying to research Professor Rokhar's testimony on cavern design which will additionally support our case.

If you can do anything to make DECC look again or to postpone any imminent decision for at least a week this would be helpful.

Best wishes

Ian