Re: Proposed application by Halite Energy Group Ltd for an underground gas storage facility at Preesall, Lancashire.

Section 1 - Introduction and background information

Dear Sirs,

For some time now we have been affected by the above proposed planning application by Halite Energy Group Ltd. Matters came to a head in February 2011 when Brian Stanley and Debbie Morris called at [blank] and demanded access to our property. At first they were polite but Mr Brian Stanley's attitude then changed immediately to one of being challenging and intimidating. My wife Vivienne was told that if she didn't give him permission to conduct his survey, then the IPC would force us to give permission. He then backed this threat up by immediately sending us a letter (see attached letter one).

We contacted the National Farmers Union and following their advice wrote to Sir John Roberts of Halite Energy informing him that we would employ a Professional Agent to negotiate on our behalf (see attached letter two). Despite our requests Halite continued to bombard us with numerous phone calls and also made attempts to enter our property. Fences were damaged to gain access and small pits were dug into the ground for soil sampling purposes.

We contacted Sir Michael Pitt of the IPC on July 10th 2011 to complain about the methods and tactics employed by Halite and also to point out that Halite have misrepresented us to other parties: they implied at meetings that our agents had asked for '£500 up front'. This was a complete fabrication from Halite Energy representatives. (see attached letter three).
In the end our agents (Crombie/Wilkinson of York) were also unable to agree any reasonable course of action with Halite and so we also wrote to Tom Carpen of the IPC on July 24th and also July 30th 2011 (see attached letter 4). We also contacted our MP for Wyre and Lancaster, Mr Eric Ollerenshaw. On January 15th 2012 and also on June 3rd 2012 we again contacted the IPC to add further comments on how our farm has been affected by previous ICI infrastructure and brine extraction works at the Preeasall Salt Field (see letters five and six). Although the infrastructure of the ICI water pipeline from Eagland Hill and also the two On-farm ICI inspection chambers affected our farming system considerably (mainly drainage) our family was able to maintain a good working relationship with ICI for approximately forty years.

Throughout 2011 and 2012 Halite continued to ignore any reasonable requests from both ourselves and also from our agents: they continued to try to gain access at any time they wanted, made persistent requests for our farm deeds and also asked us to immediately sign the legal document which they had drawn up for farmers who may be affected by the gas pipeline. These aggressive actions of Halite Energy Ltd continued unabated until the compulsory acquisition hearing on October 9th 2012 at the North Euston Hotel, Fleetwood ((objection 1.6, GJT & V Parkinson: plot number 165).

Although the meeting was over a long time period it gave each individual/business only a few minutes to make points or to ask questions to the Panel (chaired by Mr Hudson) which Halite then had the opportunity to answer. I asked a number of questions to the Panel about the Halite application which Mr Humphries QC (representing Halite) chose to completely ignore.

Mr Humphries QC representing Halite suggested that I was uncooperative and did not write or correspond with them. As I have mentioned above we wrote to Sir John Roberts of Halite (dated February 8th 2011) informing him that we were to engage an agent after taking advice from the National Farmers Union. Our agents (Crombie/Wilkinson of York) were also unable to agree with Halite on a suitable course of action for both parties - however it was not from a lack of effort by us or Crombie/Wilkinson.

I came away from the meeting with the impression that the Panel were mainly trying to gain as much information as possible in order to make a reasoned judgement at a later date. However this also gave Halite the opportunity to
answer our objections at a later date without actually answering any of our very valid questions at the meeting.

I was disappointed when the Panel seemed to concentrate on Halite’s suggestion that only 2.6 acres of our farm was to be lost to the pipeline – Mr Bashall said that it did not seem much out of 56 acres. If the additional inaccessible narrow strips (which would be cut off by the proposed pipeline) are taken into account it would be at least double this amount as well as the land being out of production for at least 2 years (see point seven below).

Mr Humphries QC also made scathing comments to the Panel about our agents Crombie/Wilkinson and their lack of co-operation with Halite representatives and made a significant stance on this issue. He also suggested that they (the agents) asked for ‘money up front’ which is completely untrue.

By taking this approach Mr Humphries QC avoided answering any of the more difficult questions regarding safety issues that I had asked the Panel. I would be extremely grateful if you would look at the questions I asked at the meeting (and which Halite chose to ignore). Please see Section 2 below.

After the meeting (on October 11th 2012) I wrote to Mr Hudson stating that I had not sufficient time to expand on all the issues at the compulsory acquisition hearing on October 9th 2012 (see attached letter 7).

Section 2 – Questions not answered by Halite

During the meeting I asked the following questions some of which were answered by Mr Bashall (land issues only):

1) The 20 metre path of the proposed gas transport pipeline is marked ‘permanent access road’ on the Halite map – why? (No answer).

2) In view of the fact that the proposed gas transport pipeline runs through the area of previously mined salt caverns (some of which may be unsafe) what indemnities will Halite be offering farmers in the event of any
accident involving the gas transport pipeline or Halite infrastructure? (No answer).

3) I pointed out to the panel that the main watercourse from Preesall and Stalmine and from our farm ran directly in a westerly direction into the river Wyre until 1974 when the Agglbys salt cavern collapsed - the main drainage ditch now runs into a large lake and out of the other side. I asked the Panel if Halite could guarantee that no further collapse of salt caverns would occur in the proposed forty year period of the gas storage facility? (No answer).

4) How long would Halite envisage that the farmers land would be out of production whilst the proposed gas transport pipeline was under construction? (Mr W Bashall did reply on this one but pointed out that it would be entirely up to the contractors - he said probably 12-18 months minimum). These points may be relatively minor however they may have a considerable bearing on the environmental impact of any future installation of the proposed gas pipeline.

5) How would Halite manage and correct the disruption to the drainage system caused by the building of the gas transport pipeline? (Mr Bashall again replied that it would be up to the contractors, therefore no definite answer to the question - it is unlikely that the contractors would tell Halite what to do).

6) What would Halite propose to do with the narrow strips of land that are left in many farmers fields where the gas transport pipeline runs parallel to and close to the main watercourses? (No answer).

7) Have Halite taken into account that significant underground water movement occurs between our land at Moss View and the Preesall Salt field? (I pointed out that ICI had a measuring facility to ascertain underground water movements when they were managing the Preesall Salt field) (No answer).
8) The proposed access/pipeline agreement which Halite have offered farmers is ambiguous - it could mean anything - Why? (No answer).

I was disappointed when the Panel seemed not to press Halite on these above issues and it is possible that the Inspectors didn’t give enough credence to the situation.

Section 3 - Summary

Vivienne and I remain unconvinced of the safety issues which surround this proposed gas storage facility and we still object to the proposal on safety grounds. This is our main concern.

For instance the substantial lake formed from the collapsed salt cavern at Agglbys in 1974 is subject to tidal forces. Although the sluice gates will shut at high tide the water from the main drainage ditch covering Stalmine Moss and a large area of Preesall will continue to pour into Agglbys Lake at times of high rainfall, particularly in the winter. This means that the water levels in Agglbys will fluctuate between tides perhaps by up to 0.3 of a metre (if similar to main drainage ditch levels). These fluctuating water levels will surely mean that the erosion of the edges of Agglbys Lake may well continue - at the moment it is eroding in a North-Eastery direction. Agglbys Lake is not a great distance from the Brine Well 45 which leaked brine on June 18th 2011 and also the route of the proposed gas pipeline lies to the North East of both Agglbys and Brine Well 45.

The proposed access road and gas transport pipeline run close to the buildings at higher Lickow Farm (adjacent to Monks Road). Two of the older wellheads close to higher Lickow Farm were identified as being dangerous (i.e. likely to subside) when ICI were still operating (managing) the Preesall Salt field. The condition of these previously mined caverns is surely likely to deteriorate further over time.

It is difficult to envisage how these areas which have previously been mined could be declared safe for the proposed forty year life of the gas storage facility. We note that that the Secretary of State intends to appoint an independent Geological Assessor to advise him on geological matters. I would
like to ask the Secretary of State if this Geological Report also includes the area of the aged existing salt caverns (plus any close or adjacent sink-holes close to the proposed gas pipeline) or whether it concentrates on the proposed (new) gas pods. It would be surely more thorough if the geology of the existing salt caverns was also considered by the independent Geological assessor?

Another area which we are worried about is the legal nature of the agreement which Halite have offered farmers in the district (landowners along the path of the proposed pipeline). The agreement is completely biased in the favour of Halite and is so ambiguous that it could mean anything. The proposed pipeline path is 20 metres wide and the agreement also gives Halite the ability to drill boreholes - why would this be necessary?

We are also concerned that a large private company can potentially acquire the resources of a small business in order to make a profit (under a Development Consent Order). We feel strongly that our human rights have been ignored - the Halite proposal is not necessarily in the National interest but is merely a business proposal for profit.

We have a history on the farm of working closely with ICI as they extensively mined the Preesall Salt field over a period of almost 100 years. They were an easy company to work with and were exemplary in all matters concerning the pipeline infrastructure maintenance and ground water table level monitoring equipment which were based on this farm. They understood that maintaining good relationships with famers and the local community was of paramount importance. Halite representatives have taken a completely different approach to dealing with famers and individuals that may be affected by the proposed development.

We are pleased that the Secretary of State intends to appoint an independent Geological Assessor to advise him on geological matters and produce a Geological Report. We feel strongly that it is imperative that the independent Geological assessor closely examines the route of the proposed gas transport pipeline as it passes through the areas previously mined by ICI.

Yours sincerely,

G & V Parkinson
Date: 7.2.201

Our Ref: BG/DH

Mr. G.J.T. Parkinson

Dear Mr. Parkinson,

My colleagues Brian Stanley and Debbie Morris called at the above address today to discuss access to your land.

As you will be aware, Halite Energy Group Limited (Halite) has succeeded Canatxx Gas Storage Limited (CGSL) and is presently preparing a submission to the Infrastructure Planning Commission (IPC). This submission will request permission to store gas in salt caverns and will include the interconnector from Preesall to Nateby.

In the past you have indicated your opposition in respect of access to your land to undertake environmental investigations. We have respected your views and have advised others, particularly Lancashire County Council and its statutory consultees, that we have been unable to provide certain information because we have been denied access to specific areas of land.

As the promoters of a nationally significant infrastructure project, we have the ability to request the IPC to provide us with permission to enter your land to undertake the necessary surveys. We are reluctant to take this course of action, as we would prefer to work with you as a land-owner.

Naturally, we would make good any damage caused and be prepared to pay for any reasonable losses which might occur as a consequence of our actions.

I should be obliged if you would contact Debbie Morris, either on her mobile, tel: [redacted] or at the office, tel: 01772-672244 at your convenience.

I enclose a stamped-addressed envelope should you prefer to contact me in writing.

Yours sincerely,

Bruce Gibson
Senior Project Manager
St. Georges Park - Kirkham
Preston - Lancashire - PR4 2EF
t: 01772 672 244
t: 01772 673 344
e: info@halite.net
www.halite-energy.co.uk
Dear Sir John Roberts,

Our farm was visited on 07/02/2011 by your “Halite” employees Brian Stanley and Debbie Morris. They were seeking to gain access to the farm for a survey and were refused permission.

We are members of the National Farmers Union and have discussed the situation with their legal team. The NFU have advised us to reply in writing and to make the following points.

The NFU advised us that it would be in our interest to appoint a professional land agent to act on our behalf, as we do not have the necessary legal knowledge to negotiate with “Halite” regarding matters relating to our land and property rights. Therefore the NFU say that your company “Halite” must agree in writing to pay any professional fees incurred on our behalf to such an agent acting for us in this matter.

Once this is agreed in writing, that is “Halite” agrees to pay professional fees as detailed above, and if our agent advises us to do so, we may consent to a survey of our land provided also that any person wanting access contacts us in advance and is accompanied while on our property by a member of the family or our agent.

There will be no access until the above details are agreed in writing to us.

Yours faithfully,

George Parkinson
Re: Proposed application by Halite Energy Group Ltd for an underground gas storage facility at Preesall, Lancashire.

Dear Sir Michael Pitt,

We would like to complain most strongly to the IPC about the procedures undertaken by Halite Energy in trying to gain access to our property. These include unwanted visits to our farm and also trespassing on our fields by Halite Energy personnel as well as telephone calls and a barrage of letters. Halite have been threatening us for months with an "IPC authorisation for access" with no clear cut explanation as to what this entails.

Following a challenging and intimidating unannounced visit by Mr Brian Stanley (who is employed by Halite Energy Group) in early February we immediately indicated to Halite Energy that all communication regarding matters concerning the proposed gas storage facility should be directed to our appointed agent, Mr Graham Mathews, of Crombie/Wilkinson, York. Halite Energy have not responded to his communication (or indeed our communication) and have continued to send us a barrage of letters.

Halite have implied that they will request the power of compulsory purchase for any land on our property that they will need for gas pipelines which may supply the proposed gas storage facility. We have a small beef farm of 56 acres and Halite’s proposal to take our largest field (which we use for growing winter forage) will mean that the business is no longer viable. The construction of this gas supply pipeline will severely affect our livelihood and permanently reduce...
the value of our holding. Our small farm would be severely blighted by this proposed gas storage development.

Halite have also misrepresented us to other parties; Helen Forrester from NFU North West has attended meetings concerned with the proposed gas storage development and has spoken to Halite Energy personnel. I spoke to Helen on the telephone last week and she informed me that she had been told by a Halite representative that we have asked for £500 'up front'. This is a complete fabrication from Halite Energy representatives.

On June 3rd 2011 we received a letter from WJ Bashall of PFK land agents, Penrith. Mr Bashall acts as land agent for Halite Energy Group. Mr Bashall thanked us for returning his letter of 25th of May informing him of the correct address for [redacted]. We did not receive his original letter let alone send it back to him. Either Halite Energy are extremely disorganised or they are systematically trying to intimidate and wear down any persons who object to the proposed gas storage facility at Preesall.

I would also like to bring to your attention another serious matter which we believe to be a breach of the Data Protection Act. On June 8th 2011 we were sent a substantial Halite Energy Group document which we believe has been widely distributed. This document (Report to Support Request for Access to Land from the IPC Section 53 Planning Act 2008 – Halite Energy Group June 2011) contains personal letters written to Halite Energy which included the names and addresses of several persons/businesses who have objected to the proposed Halite gas storage facility. The names and addresses of persons and businesses affected have been included in this document without permission being sought and this act must surely breach the Data Protection Act.

We would be extremely grateful if you would provide the views of the IPC on the continued actions of Halite Energy Group in the pre-planning application process.

Yours sincerely,

George Parkinson BSc
Dear Sir,

Thank you for your letters dated July 27th 2011. We have discussed the situation of Halite’s demands for access with the MP for Wyre and Lancaster, Mr Eric Ollerenshaw. We explained that Halite have sent letters seeking to gain access without stating a time-schedule of works (including dates and specific times), who is to gain access and the specific purpose and methodology of any surveys carried out. I have been informed by other farmers that Halite has entered farms even if permission has not been granted. On our farm it appears that soil samples have been taken and in any normal circumstances this would be regarded as criminal damage.

Mr Ollerenshaw pointed out that it was unlikely that this approach would happen in any other business sector. From February 7th this year we have politely requested that Halite send all correspondence to our appointed agent, Crombie Wilkinson at York. We have made this request a number of times. These requests have been completely ignored, and Halite continues to contact us regularly, by telephone and letter, and further, their employees often turn up unannounced at the farm, which has caused distress to me and my family.

By ignoring our requests for mediation, and continuing to regularly bombard me with letters, together with unannounced visits, Halite have not made all reasonable efforts to obtain right of entry to our land.

These continued duplicitous actions of Halite Energy do not demonstrate ‘tight, joined-up management’ of a ‘caring’ professional energy company nor do they demonstrate the forward-thinking policy and business strategy of a company that would act in the national interest.

Yours sincerely,

George Parkinson BSc
Dear Sirs,

I would like to object strongly to the proposed storage of gas at the Preesall Salt field for the following reasons:-

a) The project would have a significant impact on our small farm business and reduce the business viability by taking land out of production for a considerable period.

b) The construction of the gas pipelines and gas storage facility would damage ancient hedgerows, farm drainage systems, main water courses and soil structure and quality for a considerable number of years. The Environmental Stewardship measures required in order to comply with Single Farm Payment Legislation would be impossible to maintain.

c) The ground water table in this area fluctuates considerably and was subject to rigorous monitoring on our farm by ICI when they ran the brine extraction unit during the last few decades. The water movement was monitored by graph and the underground water levels moved considerably. This significant movement of underground water has the potential to move the gas pipelines following construction - a movement which may be potentially hazardous.

d) It is proposed that the gas transport pipelines are to run directly through a considerable area of land that has previously been mined by ICI in the last century, before eventually reaching the gas storage facility. It is well documented that many of the old salt mines have collapsed leading to subsidence of the land over large areas. It would surely be impossible to predict accurately that no further collapses of existing salt caverns would not take place in the proposed 40 year life of this storage facility. It could be argued that to place the gas transport pipelines to the proposed storage facility directly through the old minefields is not a safe or well-constructed business proposition.
e) One of the existing salt caverns which is near to the proposed storage facility has previously been used to store mercurial sludge - a potential environmental hazard in the event of any accident.

f) The project would have a significant effect on the environment. The construction of the storage facility would impact on the area and damage the ecology by the pumping of brine into the Irish Sea.

Yours sincerely,

George Parkinson
Dear Sirs,

On January 15th 2012 I contacted the IPC to object to the proposed Underground Gas Storage Facility at Preesall Salt-field, Lancashire. I would like to make some further points as space was limited on the original email I sent. (IPC Reference no: EN030001).

It is well known that most of the salt-field at Preesall has been previously mined by ICI during the last Century. The process involved pumping large quantities of water from the Preesall and Pilling areas and then using this to flush out the salt as brine before transporting it across the river for further processing at the Thornton factory.

To obtain these large quantities of water needed for brine extraction ICI constructed and laid two large concrete pipes which carried the water (0.6m in diameter) and a third smaller metal service pipe containing cables. These pipes run through our farm and are still in situ in June 2012 although they have not been used since the 1990’s. These concrete pipes were constructed in the early part of the last century.

In 1915-1920 ICI constructed a large platform on the farm and drilled a borehole to extract water from under our land (by license). The water was piped in the newly constructed large concrete pipes into the salt-fields and used to extract the salt as brine from the underground caverns. An over-ground inspection chamber marks the point where the diagonal cast iron pipe from the farm borehole connects to the main concrete pipe to transport the water to the salt-fields. This borehole was situated on land which was formerly part of [removed] but which is now part of the holding known as [removed].

This borehole for water was only in operation for a short time (less than three years). The reason that it was closed down was that the borehole started to draw in salt-water back from the Preesall salt-fields – the water became impure (contaminated with salt) and was therefore unfit to use for brine extraction. The ICI concrete pipes were eventually extended to Pilling and then to Eagland Hill where the water was found to be more suitable (pure) over an extended time period. These two concrete pipelines still run through the Preesall
salt-field and through areas which have previously been mined and therefore which are potentially unstable. If any gas were to escape from an underground storage facility it could potentially migrate along these concrete pipes for a considerable distance – they are not in a good state of repair and are therefore a potential hazard.

The main reason that I am writing about this borehole is to point out that even in the period 1915 to 1930 the underground water movements in this whole area were significant. The borehole on our farm had drawn in salt water from a considerable distance. As I mentioned in my previous email ICI then set up an underground water level monitoring facility on our farm which recorded ground water levels on a graph (as underground water movements have always been significant in this area). This facility operated well into the 1980’s but was mothballed as the Preesall salt-field became exhausted.

If underground water movements were important and significant in 1920 and in 1980 why are they not important today? The whole underground geology of this area appears to be fragile and interlinked. The existing previously mined salt caverns are notoriously unstable and many have collapsed over time. They are also crossed by a number of large pipes which were used to transport both water to the salt-fields and then transport the extracted brine to the Thornton factory. It is surely not safe practice to lay gas transport pipes and road-ways through this previously mined area. Undoubtedly it would be almost impossible to map the precise underground geology of this area with its significant underground water movements (and possible salt drift) which have occurred over a considerable time period.

Can this large area of salt-field which has previously been extensively mined ever be declared safe and hazard free for the proposed forty year life of the proposed gas storage facility? The old salt-field is littered with collapsed holes (caverns) which continue to erode. These collapsed caverns have been fenced off due to the hazardous condition of the surrounding soil – often the fences have been moved back as the soil banks continue to erode. The recent escape of substantial quantities of brine water from a well-head in the summer of 2011 is an example of the inherent unstable nature of the old salt caverns mined by ICI.

I am not convinced that the geology of the previously mined salt-fields can ever be fully mapped or predicted and therefore the proposed gas storage facility is potentially extremely dangerous.

The significant underground water movements also mean that the entire area may not be suitable for gas storage facilities and also not safe for the construction of gas transport pipelines.

Yours faithfully,

George Parkinson
Dear Mr Hudson,

I recently attended the compulsory acquisition hearing on October 9th 2012 at the North Euston Hotel, Fleetwood (objection 1.6, GJT & V Parkinson: plot number 165). It is my opinion that I did not have sufficient time to expand on some of the issues discussed in the meeting and on reflection I feel that I should have discussed some of the issues in further detail.

I would be extremely grateful if you could read the following letter and inform the panel of our comments.

I did not expand on the fact that we considered Halite’s approach to land owners was heavy-handed and unprofessional. The initial approach by Halite representatives was made on February 7th 2011 by Brian Stanley and Debbie Morris who made an unannounced visit to the farm. Even at this initial meeting Brian Stanley threatened my wife Vivienne that (if we would not co-operate with their requests) Halite would seek powers from the IPC to gain entry to our land. This was confirmed in writing on the same day by Bruce Gibson (Senior Project Manager). Please see the attached letter from Mr Gibson dated February 7th 2011.

Halite suggested that I was uncooperative and did not write or correspond with them. I would like to point out that we wrote a letter (sent by registered post) on February 8th 2011. We wrote to Sir John Roberts of Halite informing them that we were to engage an agent after taking advice from the National Farmers Union. Please see the attached letter to Sir John Roberts dated February 8th 2011.

Although Halite entered into correspondence with our appointed agents Crombie Wilkinson from York they ignored our requests to contact us through the agent. This was to ensure that any farm visits were agreed in advance and that any Halite representative would be accompanied by our agent or a family member. Throughout the summer of 2011 Halite’s representatives made a number of unannounced visits which became more frequent in July 2011. On July 10th 2011 we wrote to Tom Carpen of the IPC to explain that we were extremely unhappy with the approach of Halite in their attempts to gain access to our land. Please see the attached letters (four in total) to Tom Carpen dated July 2011. Other farmers in the district were also concerned about the approach of Halite and
asked me to write a joint letter which we signed (see attached joint letter). Tom Carpen sent us an email on August 4th 2011 which informed us that Halite had withdrawn the request to gain access to land (Please see attached email from Tom Carpen).

Mr Humphries of Halite was not disclosing the full picture when he said that we had not replied to any of Halite’s correspondence. I would like to point out that much of Halite’s requests to us have been verbal, by telephoning us or by visit to our farm, and there is no record kept by Halite of these communications. We have informed Halite on a number of occasions that we do not support their planning application mainly on the issues of safety. Although Halite has been aware of our concerns they have continued to harass us over a considerable time period.

At [redacted] we have tried to take the approach of making an informed business decision based on how the project would impact on our small business (which may be over a considerable time period for this project).

This land is our land, our business, our livelihood and our views have simply been ignored and not at all respected. We also noted that Mr Humphries did not comment on our question of Indemnities offered to landowners in the event of any future accident or unforeseen event.

Finally we also strongly feel that the ‘easement agreement’ offered to farmers by Halite (for the gas transport pipeline) is extremely vague and lacks clarity.

Yours sincerely,

George Parkinson Bsc