

Appendix 2

Petroleum Licence Application PLA1/16 draft consultation response.

The Department for the Economy
Minerals and Petroleum Branch
Room 9
Dundonald House
Upper Newtownards Road
Belfast
BT4 3SB

Dear Sir

The People and Communities Committee has considered the matter of the Department for the Economy's (DfE) recent consultation into Petroleum Licence Application PLA1/16 by EHA Exploration Limited at its meeting of 5th June 2019 and would provide the following comments by way of response.

The Committee notes that DfE, in the presence of an Assembly and Minister, would normally have consulted on a Petroleum Licence application on the basis of an *'intention to award'*, having already obtained Ministerial approval. DfE has advised however that under current circumstances and having regard to the November 2018 Secretary of State, *'Guidance on decision-making for Northern Ireland Departments during the period for Northern Ireland Executive formation'*, the Department has completed a public interest test and concluded that the Department should continue all necessary preparatory works to ensure that a decision on this Petroleum Licence application can be taken as soon as possible after a Minister is appointed.

Although DfE has initiated an eight-week consultation exercise, running from 7th May 2019 until 5th July 2019, this Committee would express its concern that the consultation exercise has been commenced directly after the 2019 Northern Ireland Local Government elections have been concluded and at a point where local government Committee memberships and governance arrangements are still to be finalised. The Committee would therefore contend that given the significance and extent of the Petroleum Licence Application PLA1/16 for Belfast City and for other council areas, the Department for the Environment has not provided sufficient information to our council on the environmental implications for Belfast.

Nevertheless, given the timeframe set forth by DfE, the Committee has reviewed the content of the Redacted Application Form for Petroleum Licence Application PLA1/16 and various other supporting documents and would provide the following initial comments to the Department.

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The Committee further notes that DfE has prefaced the application by advising that the Department licenses the search for, drilling for and extraction of hydrocarbons, hydrocarbons (oil and gas) being the current dominant fuel source for the Northern Ireland energy market. DfE has stated that hydrocarbons are presently all imported via ship (oil) or pipeline (gas) and that the future discovery of any potential indigenous oil or gas supply would benefit the local economy and additionally provide improved security of energy supply. DfE does however acknowledge that although it is government policy to increase the use of renewable energy and reduce greenhouse gas emissions, there is likely to be an ongoing need for oil and gas to meet demand, particularly in the heat and transport sectors.

B

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The Committee would highlight that the March 2019 Department of Agriculture, Environment and Rural Affairs (DAERA) publication entitled, '*Northern Ireland Greenhouse Gas Projections Update*,' advises that the energy sector accounts for around 20% of Northern Ireland greenhouse gas emissions, with the transport sector accounting for a further 22% of emissions. Whilst the Committee acknowledges the benefits of an indigenous oil or gas supply in terms of the local economy and security of energy supply, the Committee would nevertheless highlight that in order to create vibrant, attractive, connected and environmentally sustainable city, the Belfast Agenda commits by 2035 to the creation of a low carbon and sustainable city that encourages walking, cycling and the use of public transport, as well as recycling waste and improving energy efficiency; a city that is resilient to environmental and climate change.

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The Committee notes that the licence applied for relates to an area of some 1,134 km², described as west, south and east of Lough Neagh and geographically illustrated in Appendix E Area Under Consideration. The area applied for therefore covers wards within Antrim and Newtownabbey Borough Council, Armagh City, Banbridge and Craigavon Borough Council, Lisburn and Castlereagh City Council, Mid Ulster Council and Belfast City Council. Within the Belfast City Council area, wards principally affected are those located in the southwest, west and north of the city; thereby potentially affecting in excess of 100,000 residents living within these areas. The proposed licenced area also encompasses aspects of the Belfast Hills, including Black Mountain and Divis.

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Annex B Technical document advises that in years 1-3 of the licence, works will involve analysis and modelling of existing exploration data and the results of Tellus airborne geophysics and ground geochemical surveys; reconnaissance geochemical surveys over the whole Licence area; geophysical surveys; electromagnetic surveys, 2D seismic acquisition 300 – 450 line kms and further modelling and analysis of the new data. **In advance of any decision or works commencing, the Committee would welcome the submission to the council of a more detailed work programme and timetable for any of the above-mentioned surveys or any other aspect of licenced activities that are to be undertaken within the Belfast City Council area during years 1-3 of the licence.**

E

In addition, the Committee would advise that the above-mentioned surveys or any other aspect of licenced activities should not adversely impact on any developed or built up areas of the city and surveys or any other aspect of licenced activities must be conducted in a manner so as to not cause any disturbance to the general public, residents or commerce within Belfast.

F

Where surveys or any other aspect of licenced activities are to be undertaken within the Belfast City council area, the Licensee should, as above **in advance** of the works commencing, consider the need for communication and liaison with the local community and Elected Representatives for the area in which the works are to be undertaken, so as to advise them of the nature, commencement date and duration of the works.

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Annex B further advises that before the end of year three of the licence, the company must decide whether to proceed with a drilling programme or to relinquish the Licence, highlighting that within years 4-5, the company must plan and design the exploration well(s), submit an application to drill (planning, technical, environmental) and subject to obtaining all necessary permits, drill the exploration well. The company must then analyse the results of the exploratory well and either plug and abandon the exploratory well and restore the wellsite or complete the well for possible future

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commercial production. The People and Communities Committee would seek a clear assurance from the Department for the Economy and from EHA Exploration Limited on a commitment to early engagement, should the Petroleum Licence be granted, and the EHA Exploration Limited consider the establishment of any drilling operations.

Yours sincerely,
Chair of People and Communities Committee

Democratic Services Officer
People and Communities Committee.