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Subject: Submission to Department of Enterprise, Trade & Investment, Scoping Report for Oil and Gas Licensing

Date: Thu, 13 Jun 2013 22:43:48 -0600

From: Jessica Ernst <magog@sasktel.net>

To: minerals@detini.gov.uk

Project Team
Minerals and Petroleum Branch
Department of Enterprise, Trade & Investment (DETI)
Colby House, Stranmillis Court, Stranmillis Road
Belfast, BT9 5BJ

Sent by Email to: minerals@detini.gov.uk

June 13, 2013

Dear Project Team,

Thank you for accepting my submission.

Please find attached a brief review of some oil and gas industry and regulator data and studies that require your careful consideration. The oil and gas industry causes impacts and liabilities that companies have admitted they are unable to repair, worldwide. Then add the cumulative impacts caused by deviated drilling and the new experiment, hydraulic fracturing. Prior to allowing the experiments in your esteemed waters and communities, and indeed, prior to spending valuable tax dollars scoping and assessing the industry's impacts in Northern Ireland, it would be simple, wise and cost efficient for the DETI to demand that industry prove first that the impacts summarized in the attached have been resolved. The impacts are serious, with solutions not yet found decades later, even with "best in the world" regulations and industry "best practices."

The brief covers only a few of the impacts, others include:

- harm to health in communities, families and workers that companies bring in (local jobs provided are few and usually the worst, such as hauling and dumping waste);
- adverse socio-economic impacts including:
 - family and community disruption,
 - increase in substance abuse, family violence, crime, suicides, *etc.*,
 - public road and infrastructure damages that taxpayers pay to repair because companies refuse,
 - stressing already stressed fire, emergency, ambulance and education services,
 - protective services withdrawn by financial institutions and insurance companies (*i.e.* prohibiting insurance coverage and mortgages for those finding themselves living in a frac zone or contracting to fracturing companies),
 - industrialization of vast areas with waste holding pits and tanks, roads, pipelines, powerlines, incinerators, flares, compressor stations, work camps (crews bring their own kitchens, rooms, entertainment) *etc.*, and

- harm to existing industries, including real estate,* tourism, fishing, agriculture, food and beverage production, and resources such as archaeological, historical, spiritual, cultural and beauty;
- air, light and noise pollution (often unbearable, sometimes driving families from their homes);
- permanent water contamination and loss,
- harm to wildlife and livestock,
- constitutional and human rights violations - governments desperate for the promised riches implement laws written by industry to put the liabilities onto landowners, families, counties and municipalities, and
- impacts yet to be determined because of settlements, non-disclosure agreements, sealed data and allowing companies to keep chemicals secret even when disclosure is mandated, such as via *fracfocus*.

DETI states:

Open to all, the consultation on the Scoping Report seeks comments on:

The appropriateness of the proposed scope of the SEA (this will help ensure that all issues of potential concern are considered);

The appropriateness of the proposed assessment methodology; and

Any additional sources of relevant information that could be used to inform the assessment.

I think DETI and other departments in the UK will find the attached a valuable, relevant resource. The industry and regulator reports and data summarized within, prove that the second sentence on Page 35 of the Scoping Report is incorrect:

"Through research, data collation and monitoring of existing developments, the potential environmental effects of petroleum exploration, production and decommissioning development is relatively well understood."

Please email if you have any questions. The endnotes within the text are clickable (Alt and Back Arrow returns you to your place in the text).

Please send acknowledgement of receipt.

Thank you.

Sincerely,

Jessica Ernst, M.Sc., President
Ernst Environmental Services
Rosebud, Alberta, Canada

*Alberta's richest postal code (just outside Calgary) is being frac'd. More and more properties are being listed and re-listed with large price reductions and some residents willing to trade to get out of the area. (Currently there are about 70 wells frac'd in the area, with plans for 4000.)

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Subject: RE: Submission to Department of Enterprise, Trade & Investment, Scoping Report for Oil and Gas Licensing

Date: Fri, 14 Jun 2013 11:56:45 +0100

From: Montgomery, Dawn <Dawn.Montgomery@detini.gov.uk>

To: Jessica Ernst <magog@sasktel.net>

CC: Reay, Derek <Derek.Reay@detini.gov.uk>

Jessica,

Many thanks for your consultation response.

I have forwarded your comments on to our consultants.

Kind regards

Dawn

Dawn Montgomery

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