

Wendy Strangeway

From: Mark Hill
Sent: 16 September 2016 08:00
To: Planning; Chris France
Subject: Fwd: Response from Frack Free Ryedale to Application No NYM/2016/0559/FL
Attachments: Application NYM.2016.0559.FL Frack Free Ryedale objection.docx; Application NYM.2016.0559.FL Third Energy safety record failures.docx

Please book in

Mark Hill, Head of Development Management.
Sent from my Samsung Galaxy smartphone.

----- Original message -----

From: REDSTON CHRIS
Date: 16/09/2016 00:24 (GMT+00:00)
To: Mark Hill <m.hill@northyorkmoors.org.uk>
Cc: Chris France <c.france@northyorkmoors.org.uk>
Subject: Response from Frack Free Ryedale to Application No NYM/2016/0559/FL



Dear Mark and Chris

It has been a while since we have been in contact, so firstly I would like to say hello again, and I hope that you have both been having a good year.

Please find attached our comments on Third Energy's application to extend their Ebberston 3 well-site, application NYM/2016/0559/FL.

I apologise for emailing you these documents directly, rather than using the online submission form, but both documents contain images that the online form did not seem to accept.

I would be grateful if you could acknowledge receipt, and post the two attached documents on your Planning Portal.

Best wishes

Chris Redston
Frack Free Ryedale
21 Pasture Lane
Hovingham
North Yorkshire
YO62 4JT

Application Number NYM/2016/0559/FL



Site address: Ebberston Moor 3 Wellsite, Cockmoor Road, Sawdon

Description: variation of condition 1 of planning approval NYM/2013/0501/FL to allow a further three year timeframe

Objection from Frack Free Ryedale

Firstly, we would like to clarify that we understand that this application is for a time extension for a previous application, and is not an application to frack. We make this point in order to assure the Committee that we understand the nature of the application, and are not attempting to paint every application by Third Energy as an intention to carry out hydraulic fracturing.

However, there are aspects of this application that are a cause for concern, which we explain below.

TIME FRAME AND THE NEED FOR THE EXTENSION

The Ebberston Moor B1 gas well was drilled at the site in 2013 under the condition that the well is decommissioned and the site restored three years after the planning permission was granted. That deadline expired on 28th August 2016, at which time the site should have been restored.

The North York Moors Planning Authority set time frames for planning permission for development work in the North York Moors National Park in order to ensure that any application is carried out within a reasonable time frame and the obvious intrusion into the peace and quiet of the Park is limited as much as possible. It is, after all, one of the country's grandest and most important national parks, and developers such as Third Energy have a duty to complete their work within a reasonable time frame, as outlined by the planning conditions attached to approval.

In this case, there seems to be rather tenuous grounds for asking for an extension. The supporting document claims that this extension is for "retention of the wellsite while further assessment of the regional geology is undertaken." However, there is no explanation about what sort of further assessment is planned, or why such appraisal has not been conducted in the four years since the well was approved in 2012.

It is the responsibility of the Committee to ask the following questions of the Applicant:

- Evidence shows that the site was drilled and cored in September 2013 and samples subsequently analysed. Why has the regional geology not been appraised within the time frame set out in the original application and its subsequent extension?
- Why is the retention of the wellsite necessary while this appraisal is undertaken, particularly given that the Applicant states "*The application is not to carry out further drilling works on the site.*"?
- Give that there has already been an extension, how certain is the Applicant that they can honour their pledge that "*At the end of the three year period, the well would be abandoned and the wellsite restored.*"?

- Is this not just an application to keep the site 'on the books' in case they might need it in the future?
- Is the principle of keeping oil and gas well-sites open just in case they might be needed in the future compatible with the National Park's aim to preserve the natural environment for the benefit of all?

Had the applicant adhered to the conditions of the original application, the site would now be restored and the surrounding woodland would be able to be enjoyed by visitors to the Park. Again, given that this is a National Park, it would therefore seem essential for the applicant to give compelling reasons for this extension, not just that it wants to keep it on the books 'just in case'. We would therefore urge the Committee to press the Applicant on its long-term plans for this well-site, and indeed for the whole of its development at Ebberston.

TRAFFIC MANAGEMENT

There appear to be concerns from the local Parish Council that the previous traffic management plan was not adhered to, and that the self-regulated nature of traffic management at the site was not satisfactory to local residents.

Third Energy state in their application that they will only have one vehicle travel to site per day, but Wykeham Parish Council have complained that traffic during the drilling stage in 2013 traffic was much greater than expected, and that this caused damage to the road and to a church wall, several incidents with cyclists and horse riders and the death of a dog.

We would suggest that the company's inability to follow a relatively simple traffic management plan calls into question their ability to manage the site effectively, and within the constraints of planning conditions imposed by the Authority. On this point alone, it is well within the authority's jurisdiction to refuse the extension requested by the Applicant.

WATER

The site is in GroundWater Protection Zone 2, meaning that there are important sources of groundwater in the area that need to be protected. Local groundwater is used as a drinking water supply. The possible future developments listed above, especially the use of injection wells, are not suitable for this site, as they put groundwater at risk of contamination. North York Moors National Park should act to preclude them by ordering the immediate restoration of the site.

If the company are allowed to keep the site, we suggest that they post a bond with the Authority to compensate any business or person that suffers injury or loss from any work done at the well-site.

FUTURE WORK ON THE SITE

Approving this extension would make Should the Applicant decide to apply in the future, for example for a further borehole, a waste water re-injection well, or other more unconventional gas extraction methods that do not currently fall into the government's narrow definition of fracking, it would be very hard for the Planning Committee to refuse such an application if they allow this well-site to remain in place. So, approving this application for a 'wait and see what happens' extension may result in the committee being unable to refuse subsequent applications.



FUTURE UNCONVENTIONAL GAS EXPLORATION?

It is noted that the original planning committee documents do not include a clause that prohibits unconventional gas exploration (including fracking) on the site. While we realise that this is an application for an extension of time, and not an application to drill the second borehole or indeed to fracking, it is concerning that such a clause is not included.

Also, given that the government's position on fracking in PEDL licence areas awarded previous to the 14th round is that they are simply 'not minded' to approve fracking in these areas, there is still some doubt as to the extent of the law regarding fracking in national parks from 'old' licence areas such as Ebberston.

If this application were to be approved, we would request that, for absence of doubt, any permission granted by the Planning Committee should include a clause prohibiting fracking or other forms of unconventional gas exploration at the site.

FINANCIAL VIABILITY OF THIRD ENERGY AND THE CAYMAN ISLANDS CONNECTION

Third Energy are, in effect, broke. In fact they are more then broke – they are millions of pound in debt. Their most recent statements online – as shown on the Company Check link below – show that in 2014 Third Energy UK Gas Trading Ltd had a net worth of MINUS £46,820,103.

<https://companycheck.co.uk/company/01421481/THIRD-ENERGY-UK-GAS-LIMITED/companies-house-data>

It is also important for the committee to understand that Third Energy UK Gas Ltd is nothing more than a shell company, owned by Third Energy Onshore Ltd. This company is, in turn, owned by Third Energy Holdings Ltd, which is a company based in the Cayman Islands.

Please see these links for confirmation of the above information.

<https://www.endole.co.uk/company/01421481/third-energy-uk-gas-limited>

<https://www.endole.co.uk/company/04946049/third-energy-onshore-limited>

The certificate proving Third Energy's parent company is based in the Cayman Islands – presumably to avoid paying tax in the UK – is shown on the next page.

The North York Moors Planning Committee has a duty to take the financial liquidity of Third Energy into account, as if the company caused an environmental issue, such as contaminating an aquifer, a catastrophic accident, etc. it is very likely that Third Energy UK Gas Ltd would simply be wound up, leaving the NYMNP to pick up the tab for any environmental clean up.

Again, this should alert the committee to the need for a substantial bond for extending this wellsite and for any further applications by Third Energy UK Gas Ltd.





CAYMAN ISLANDS

Search Report

Entity Name: THIRD ENERGY HOLDINGS LIMITED
Jurisdiction: Cayman Islands
File Number: 251039
Formation Date: 18-Jan-2011
Registration Date: 18-Jan-2011
Entity Type: Company:EXEMPT
Registered Office: MAPLES CORPORATE SERVICES LIMITED
PO Box 309
UGLAND HOUSE,
SOUTH CHURCH STREET,
CAYMAN ISLANDS
Status: ACTIVE
Status Date: 18-Jan-2011

-
- INFORMATION REGARDING THE CORPORATE RECORDS AND REGISTERS ARE NOT AVAILABLE FOR PUBLIC INSPECTION.
 - THIS REPORT DOES NOT CONFIRM THAT THE ENTITY IS IN GOOD STANDING.

NYMNP

16 SEP 2016

THIRD ENERGY'S APPALLING SAFETY RECORD

Point 1.0 of the Applicant's supporting statement is as follows: In total, Third Energy and its predecessor company in Yorkshire, Viking UK Gas Limited, have over 20 years of operations in the area. All drilling and operational works to date have been undertaken safely and with no adverse impact to the environment or communities.

This statement is demonstrably incorrect, as in the past few years the safety record of Third Energy (previously called Viking Gas UK Ltd) in Ryedale is one that has included a documented sour gas leak, problems with flooding, staff accidents and clashes with the HSE regarding well-casing design, procedures and poor maintenance regimes. This hardly the 'excellent' track record proclaimed by Third Energy.

Further details of recent safety issues with Third Energy are included on a separate document. On reading this evidence – much of which came from FOI requests – it is impossible to conclude that “all drilling and operational works to date have been undertaken safely and with no adverse impact to the environment or communities”, as the company claims.

On this point alone, it is within the powers of the Authority to refuse this application.

CONCLUSION

In short, the Applicant has had more than enough time to develop this gas well – in fact, they have had a year longer than the committee originally gave them. That time is now past, and the company have had their chance. This application is simply a way of trying to buy time in case they might need it in the future. Given its location in a National Park, companies should not be allowed to establish well-sites that blight the landscape in this manner.

Also, the dire financial situation of Third Energy and its mendacity regarding its appalling safety record should be taken into account when assessing this application. This company is not solvent, would not be able to deal with demands for financial restitution, and is not being honest about its safety record over the last 20 years.

It is therefore our request that the application be refused.

Chris Redston

on behalf of

Frack Free Ryedale



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15 SEP 2016

THIRD ENERGY SAFETY FAILURES

Point 1.9 of the supporting statement for this application is as follows: *In total, Third Energy and its predecessor company in Yorkshire, Viking UK Gas Limited, have over 20 years of operations in the area. All drilling and operational works to date have been undertaken safely and with no adverse impact to the environment or communities.*

This is demonstrably incorrect, as the following report will show.

In the past few years the safety record of Third Energy (previously called Viking Gas UK Ltd) in Ryedale is one that has included sour gas leaks, problems with flooding, staff accidents and numerous clashes with the HSE regarding well-casing design, procedures and poor maintenance regimes. This hardly the 'excellent' track record proclaimed by Third Energy.

Frack Free Ryedale have obtained the following information from the Health & Safety Executive (HSE) via Freedom of Information (FOI) requests:

'Poor standard' of management on the existing pipeline

The pipeline in question is part of a network that connects Third Energy's existing sites with Knapton Generating Station, which is also owned and managed by Third Energy. However, this pipeline network has been the subject of intense criticism from the HSE for the past seven years for poor management and inadequate standards, and has also been the subject of at least one serious sour gas leak, which occurred in Pickering in 2014.

On the 26th August 2008, the HSE conducted its annual pipeline review and the findings were so worrying that the HSE wrote a scathing letter to the operators of the pipeline, which contained a very critical review of the current condition of the pipeline and the poor standard of management of said pipeline.

The HSE inspector stated, "I refer to the above meeting and my subsequent email dated 22/08/08. While I see the implementation of your pipeline management system document as a positive step forward, I do remain disappointed at the speed of its implementation. I see from my notes of our last meeting 6th February 2007 that implementation was expected by mid-April 2007."

"Of particular concern is the continuing poor standard of cathodic protection applied to the pipeline system. It is believed that this is due primarily to the failure of isolation joints on the system, a situation that has continued unresolved for many years."

"As I mentioned in my email, I remind you of regulation 13 in the pipeline safety regulations 1996, which places an absolute duty on operators to maintain pipeline in an efficient state, in efficient working order and in good repair."

I also believe that in line inspection, utilizing intelligent pigging techniques, which represents good practice within the pipeline industry is required to **quantify the level of degradation**, which may have taken place to date. **Unless substantial progress in these areas is reported to me by the time of our next review meeting, I shall be left with no alternative than to serve an improvement notice on your company."**

A copy of the letter, obtained via an FOI request, is shown below.

Hazardous Installations Directorate
HM Principal Inspector of Health and Safety :

Viking UK Gas Ltd
Knapton Generating Station
East Knapton
Malton
N. Yorks
YO17 8JF

Your reference:
Our reference: Viking/PSR/001
Date: 26th August 2008
Direct line : 0115-971-2840



Dear

ANNUAL PIPELINE REVIEW MEETING – 21ST AUGUST 2008

I refer to the above meeting and my subsequent e-mail dated 22nd August 2008.

While I see the implementation of your Pipeline Management System document as a positive step forward, I do remain disappointed at the speed of its implementation. I see from my notes of our last meeting (6th February 2007) that implementation was expected by mid April 2007.

Of particular concern is the continuing poor standard of cathodic protection applied to the pipeline system. It is believed that this is due primarily to the failure of isolation joints on the system, a situation that has continued unresolved for many years.

As I mentioned in my e-mail, I remind you of Regulation 13 in the Pipeline Safety Regulations 1996, which places an absolute duty on operators to maintain pipelines in 'an efficient state, in efficient working order and in good repair'.

I also believe that In Line Inspection, utilising Intelligent Pigging techniques, which represents good practice within the pipeline industry, is required to quantify the level of degradation, which may have taken place to date.

Unless substantial progress in these areas is reported to me by the time of our next review meeting, I shall be left with no alternative than to serve an Improvement Notice on your company.

This meeting has been provisionally arranged for 6th October 2009.

Sour Gas Leak in February 2014

On the 13th February 2014 at 10.49 a.m., an operative from Third Energy noticed water 'bubbling' in standing surface water at the Pickering site. The operative contacted the site manager at Knapton Generating Station and the pipeline was 'shut' and 'de-pressured'. Later that morning, Third Energy inspected the site and confirmed the bubbling was in fact 'sour gas'.

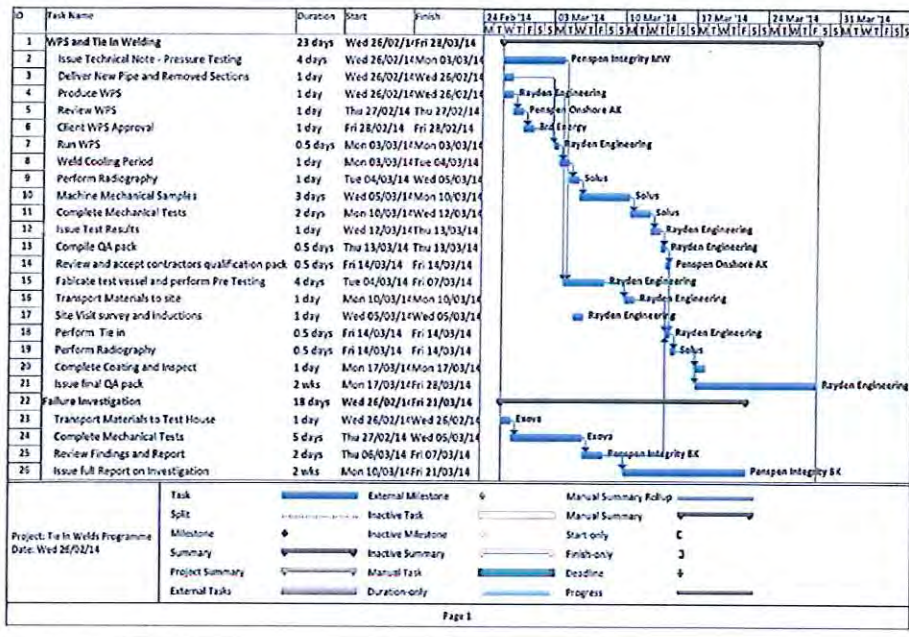
Sour gas is a form of natural gas that contains increased levels of hydrogen sulfide. which is a colorless gas with the characteristic bad smell of rotten eggs. It is also heavier than air, very **poisonous, corrosive, flammable, and explosive**, and also very toxic in small amounts, according to some reports.

Sour gas explosions are a genuine threat and have occurred multiple times in the USA and Canada over the last 5 years (see links below).

<http://calgary.ctvnews.ca/sour-gas-well-capped-dry-creek-bay-residents-permitted-to-return-home-1.2115263>

<http://globalnews.ca/news/657979/sour-gas-rupture-in-flooded-southern-alberta/>

Over the course of the next five weeks Third Energy completed a repair of the damaged pipeline. The five week period is shown on this schematic, showing – the blue-shaded table on the right – that work repairing the leak started on 25th February and was completed on 28th March.



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However, it is not known how long this pipe was leaking the highly toxic and explosive sour gas. Residents living near the route of this ageing and poorly-managed pipeline would be forgiven if they thought that following the leak that the HSE would increase the number of inspections to the site.

Failure of the HSE to inspect the pipeline.

Despite this leak, documents reveal that the last inspection on the pipeline was 2010 and there isn't an inspection planned this year or scheduled at any other time in the future.

This email states the following (p1 and 2):

2. The last pipeline inspection was 14/12/2010, inspection report previously provided.
3. There are no planned pipeline inspections within the current year. Future inspections of the pipeline operations will be considered within the intervention planning process. Please see link below for details of the intervention planning process for onshore pipelines:

<http://www.hse.gov.uk/gas/major-hazard-interventions-onshore-gas-pipelines.pdf>

It therefore appears that the HSE have stopped inspecting the pipeline, meaning that the current state and integrity of this underground pipeline is unknown. This is a serious concern, given that the pipeline is central to the application to frack at KM8, as it will transport water to the site, and also take the gas away from the site to Knapton Generation Station during the production test and commercial production phases.

Please see the next page for written confirmation, obtained via FOI requests by Frack Free North Yorkshire, of the sour gas leak and other failures.

For original reference, please see this HSE email from 20.02.14 below.

As promised see picture attached and brief dairy time line of key actions taken thus far and plan going forward. I will send on second email with more pics.

TEUKG= Third Energy UK Gas
HSE = Health and safety Executive.

KGS = Knapton Generating station.
AGI = Above Ground Facility.
RAMs = Risk assessment and Method statement.
TBT= Tool Box Talk.
NDT = Non Destructive Testing.



13/02/2014,

At 10:49 operator on picking well site noticed small but frequent bubbles passing through standing surface water on Pickering well site and informed ~~ML~~ at KGS. ML requested gas monitor sampling in this area this confirmed the bubbles to be sour gas.
10:53 All AGI well heads shut in and pipeline inventor de-pressured through KGS gas turbine and ground flare.
11:00 TEUKG general manager informed of pipeline issue.
11:00 Pipeline Maintenance and Tech support (Grey star) informed of situation
Once full inventory flare PK to KM pipeline isolated and vented via H2S scrubber.
14.50 Contacted HSE pipeline inspector left message on answer phone.

Email from Operators to HSE regarding sour gas leak in Pickering in 2014

14/02/2014,

Greystar Pipeline supervisor attended site. Meeting to discuss issues and actions to resolve.
Mobilised civil contractors to start excavation.
Pipe line detected and marked on surface including depth measurements.
Completed procedures RAMs, TBT and raised permit for excavation.
11:40 contacted HSE to inform of suspected pipe leak actions taken and plan for inspection repair etc.
RIDDOR report completed online.
Area for excavation checked for services and all services marked out along with excavation length and width.
Update relevant TEUKG and Greystar personnel.

15/02/2014,

Cup pig launched with N2 to purge suspected leaking area of pipeline and to isolate liquids from leaking into excavation.
Completed excavation to expose pipe.
Trench shawed and safe access and egress in place.
Update relevant TEUKG and Greystar personnel.

'Environmental incidents' in 2009

The HSE letter (dated August 2008) referenced earlier on in this document highlights quality and safety concerns that had 'continued unresolved for many years'. Unfortunately Third Energy continued to use the pipeline and in 2009 the HSE conducted two further reviews which highlighted numerous health and safety issues with the pipeline.

These included three environmental incidents, two injuries to personnel that resulted in employees having time off work (LTA's), six near misses and five minor injuries, also called non-LTA's.

We had requested copies of the environmental incidents and the lost time events, However, the HSE has now destroyed the relevant information relating to these incidents, so we may never know the seriousness of the three environmental incidents or injuries sustained to personnel.

Below: Extract from HSE pipeline inspection in 2009 citing numerous HS & E incidents. For original document of the inspection report, please see Attachment 3.

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OS DIVISION

INSPECTION/CONTACT REPORT

valid from 1 April 2003

Client Name <i>Enter the accurate name of the Client</i>	Viking Petroleum
Location Address <i>If relevant – mandatory for an inspection</i>	Knapton
Date of Inspection/Contact <i>(dd/mm/yyyy)</i>	8/10/09
Persons Seen <i>Include their job title or role (e.g. Safety Advisor, MD, TU Rep)</i>	Pipeline Comp Auth r Viking
Reason for Contact <i>(E.g. routine visit)</i>	Pipeline Annual review

6 HSE Records

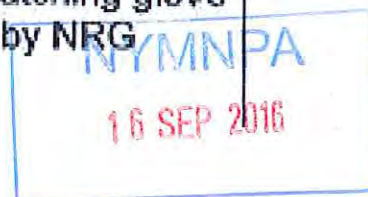
3 Environmental incidents

2 Near miss incidents, 1 with Bakers where the wrong elevators for the tubing were used

1 non loss time, cutting slick line that had not been clamped properly and the end flicked up catching glove

HSE audit for council planning completed by NRG

copy taken for review



Flooding at Marishes

IN January 2013 Third Energy's drilling contractor, Moorhouse Petroleum, emailed the HSE to report that Third Energy's Marishes site was under three feet of water because the two rivers enclosing the site had burst their banks and flooded the site.

Third Energy in 2013 also submitted a screening request to North Yorkshire County Council for permission to drill two exploratory wells, one of which was specifically targeting the Bowland Shale. This indicates that they are considering using Marishes as a potential fracking site in the future.

To date a full planning application hasn't been submitted by Third Energy at this site, but one should seriously question the risk posed by flooding in the area should Third apply to frack near Marishes in the future.

The current Third Energy site at Marishes in Ryedale is sandwiched between two important water sources, the River Derwent and Costa Beck. The River Derwent and its tributaries are protected under EU legislation, and are considered significant for nature conservation, ecology and landscape. The area contains a diverse range of habitats many of which are designated sites, while the river itself is also used for drinking water abstraction for towns such as Scarborough. Therefore any contamination of this waterway due to flooding could potentially lead to significant environmental issues.

This issue has particular resonance at this time due to the widespread flooding suffered by the north of England, including York and areas of North Yorkshire, and the potential risk to water supplies and residents if fracking were to be allowed in these areas.

Email from Moorhouse Petroleum, on behalf of Third Energy, to HSE regarding Marishes Flooding incident is shown below.

From: <>
Sent: 16 January 2013 09:38
To:
Subject: RE: Water sample for KM 7

Hi

KM7 is fine with regard to flooding.
Another of the Viking Wells, Low Marishes (the name says it all!) then this is currently around 3ft under water and is known to be above head height when the banks break loose!!

The main issue weather wise is -10degC outside! Not looking forward to be out on site for this LRP RU!

BSOR document – (PSSE) usually brings the document together, but there is a great deal of input from Viking, (skeletal work already in place from KM7 Drilling activities). In addition, and we will certainly have a "Well Intervention on Paper" review of the programme and the BSOR pre Job, if things look like they are progressing then we will schedule this around 28th Jan onwards to check safety/equipment and methodology for the intervention.

Regards,

Moorhouse Petroleum Limited, trading as Moorhouse Drilling and Completions.
Moor House, Bessingby Way, Bessingby Industrial Estate, Bridlington, East Riding of Yorkshire, YO16 4SJ.

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Insufficient well-casings or barriers at KM7

In 2012 The HSE were again critical of Third Energy, this time at their KM7 well site in Kirby Misperton. At the time Third Energy wanted to re-stimulate an existing well to produce gas. **However, the current proposed construction only provided a single barrier between the annulus and the outside world. Good practice requested a minimum of two barriers.**

An email from the HSE on the 16th November 2012 highlighted the serious problems with the current proposals stating the following:

"I have had a conversation with Viking UK gas (now Third Energy) regarding the proposal to produce

from the annulus and advised that the potential of hydrocarbons that are sour and corrosive through the annulus with a single barrier (annulus valve) would not accord with industry best practice or their own policies and procedures". Furthermore I "do not believe that this proposal aligns itself with the ALARP principle".

Following the email exchange, The HSE attended a meeting with the operators in 2012 and highlighted in their power point presentation to the operator that "more work [is] required to determine risk to life of people outside the fence."

Eventually Third Energy relented and proceed in-line with the HSE requirements. However, this clearly demonstrates an operator who was willing to ignore 'good practice' industry guidelines despite the risk it posed to life 'outside the fence'.

See below for HSE email relating to the failure to observe industry 'best practice' in Third Energy's proposals for the well. For original source material, see: [HSE email 16.11.12 – Page 1.pdf](#)

From:
Sent: 16 November 2012 13:00
To:
Cc:
Subject: KM7 Water Sampling Procedure

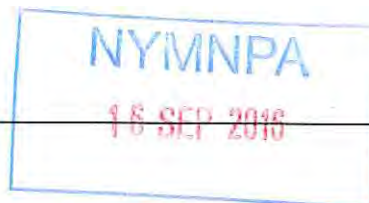
Thanks for the notification for the proposed operations. I have had a previous conversation with Viking UK Gas regarding the proposal to produce from the annulus and advised that the potential production of hydrocarbons that are sour and corrosive through the annulus with a single barrier (annulus valve) would not accord with industry best practice or their own policies and procedures.

I can understand that Viking would want to get a sample of the liquids but do not believe that this proposal aligns itself with the alarp principle. If a fluid sample is required then the sample can be taken from the tubing side by pump or swabbing with suitable well control (shear seal) if there were to be a release.

I will complete my inspection early next week and although I am aware that you are seeking an exemption from the 21 day notification period for the wireline I would like to advise Viking Energy that it is probable that we would require a face to face meeting to discuss the proposal, risk analysis of options for final selection, the management of the operations, suitability of equipment, well examination process and emergency response.

Please call if you need to discuss

Regards



Conclusion

Third Energy's safety record in Ryedale is one that has included sour gas leaks, problems with flooding, staff accidents, environmental incidents and numerous clashes with the HSE regarding well-casing design, procedures and poor maintenance regimes. This is hardly the 'excellent' track record proclaimed by Third Energy.

In conclusion, the above information demonstrates clearly that Third Energy have a very poor safety record of the company, which is clearly contrary to its claim in the application that "*All drilling and operational works to date have been undertaken safely and with no adverse impact to the environment or communities.*"

The safety of the Park is paramount, and it is clear that this company not only has a shocking safety record, but that it is prepared to lie about it in this application to the Park Authorities.

We recommend that on the company's safety record alone, the North York Moors National Park Planning Committee should refuse the application.

FRACK FREE RYEDALE

NYMNP
16 SEP 2015