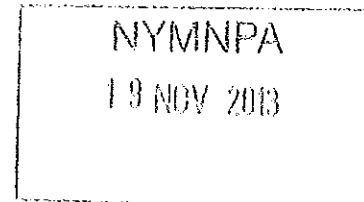


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Mr M Hill
North York Moors National Park Authority
The Old Vicarage
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YO62 5BP

BY EMAIL

Your Ref: NYM/2013/0477/EIA and NYM/2013/0593/EIA
Our Ref: 19819/A3/PF/SO
18 November 2013

Dear Mark,

FULL PLANNING APPLICATIONS FOR A TEMPORARY GAS PROCESSING FACILITY AND PERMANENT PIPELINE AT EBBERSTON MOOR, SNAINTON (VIKING UK GAS LIMITED)

This letter sets out the response of Viking UK Gas to the comments raised by Moorland Energy Limited in its letter of 24 October 2013 with respect to the aforementioned Planning Applications. Viking Gas has included the original text submitted by Moorland Energy (*marked in italics*) to assist in the analysis of the response. This letter takes into account the discussion at the meeting with yourself and Chris France on 6 November. We acknowledge that any advice from officers is without prejudice to the determination of the two planning applications.

Item 1- The Environmental Statement is Technically Flawed

Having reviewed the Environmental Statement (ES) submitted with the planning applications, whilst it outlines the processes involved in the proposed development, the processes and their impacts have been underestimated. It is therefore our opinion that the ES is technically flawed and we question its robustness on the basis of its lack of technical detail and the assessment of the likely impacts as outlined below.

Viking UK Gas' Response:

Viking UK Gas does not accept that the Environmental Statements (ES) submitted with the two planning applications are technically flawed. We consider that the proposed developments are sufficiently detailed to enable the likely environmental impacts to have been accurately assessed and the appropriate mitigation measures to be proposed.

Viking UK Gas considers the likely impacts of the proposed development have not been underestimated and have been properly assessed by suitably qualified internal and external consultants. Viking has adopted a structured development programme similar to that used by Moorland Energy in the Ryedale Gas Project.



ES 25/537

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Viking UK Gas considers that a ~~measured-phased-approach~~ to assess the technical and commercial viability of the Ebberston gas reservoir is the preferable solution, which would mitigate the potential for unnecessary installation works and the corresponding potentially significant adverse environmental impacts. The overriding desire to minimise unnecessary adverse environmental impacts led Viking Gas to investigate an 'Early Development Scheme' (EDS) which would operate for a temporary period of 5 years.

Viking UK Gas further believes that Moorland Energy's assertion, that the ES and the EDS design is technically flawed, is based upon a misunderstanding of the full design which is commercially sensitive. The information included within the ESs and the Planning Applications have been compiled to satisfy the requirements of national legislation. The concerns raised by Moorland Energy with regard to 'lack of technical detail' are an attempt to gain a greater technical understanding of the process design and hence obtain a commercial advantage.

Item 2 - Flare System

The Environmental Statement does not provide sufficient information to the National Park Authority or the Environment Agency to enable an informed decision to be made on how the flare should be treated from a regulatory perspective.

Viking UK Gas' Response:

Permitting is a separate process with its own legislative controls, managed under a separate consenting regime to planning and EIA. There is no requirement to set out permitting requirements in the ES. Permits will be applied for separately to the planning application. Therefore, there is no deficiency of this nature in the Ebberston Moor EDS ES.

Viking UK Gas considers that the aforementioned statement is purely subjective, and the Ebberston Moor EDS ES provides sufficient information and is based on the most advanced flaring techniques to reduce emissions, whilst maintaining the safety requirements outlined by UK and International codes and good engineering practices.

Specifically, the key piece of information that the application has omitted is the thermal rating of the flare. If the thermal rating is over 3MW then the flare will have to be regulated under the Environmental Permitting (England and Wales) Regulations 2010 ('EPR'). Again being specific the requirement for such a plant stems from the following two points:

The Applicants claimed use for the flare;

'4.81 A flare system will be provided to assist start and stop operations and eliminate fugitive emissions. Flaring will occur when gas needs to be routed to the flare until it is of an acceptable quality before transfer into the NGN facilities.'

Viking UK Gas' Response:

It is considered that this definition implies that the flare is to be used for the continual disposal of 'waste gases'. "Waste Gases" are scrubbed to remove hydrogen sulphide and routed in an environmentally sound way to a power generator and other utility systems (hot water system) ensuring that, where feasible, waste gases are recovered and utilized.

Therefore, under Schedule 1, Part 2 of Environmental Permitting (England and Wales) Regulations 2010 the flaring of such gases would actually come under the definition of a Part A(1)(b)(iii) process, namely 'fuel manufactured from, or comprising, any other waste' and therefore does not require a permit from the Environment Agency.

With respect to the thermal capacity of 3MW it should be noted this is a very small flare relative to

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the scale of the development and the anticipated volume of gas to be produced. As a point of reference the plant will process up to 15mmscfd which equates to approximately 71MW of thermal capacity.

If the flare has a rated capacity of over 50MW thermal then the flare needs to be regulated under Part A(1)(a) of the same schedule of the EPR irrespective of whether waste gas will be burnt or not.

Viking UK Gas' Response:

Viking Gas confirms that the rated flow capacity of the unit is 15mmscfd. Notwithstanding the most advanced safety systems including a High Integrity Pressure Protection (HIPP) system, full flow relief is not possible. This factor will ensure that the environmental impacts associated with large volume flare releases are significantly reduced and consequently this will reduce potential emissions. During start-up and shutdown, procedures will be formulated to ensure that the 50 mW thermal limitation is not exceeded. In the event of other relief cases, such as the "fire case", this will be managed by controlled flaring through the relief valve (RV) or blowdown valves as required, the thermal release will be much less than 50mW.

The Committee report for the Ebberston EDS application stated that the rich amine and glycol would be transported by licensed operators off-site to existing handling plants in Tyneside. These would be operated by a third party. As these existing plants already process waste products of this type, the permitting arrangements are not relevant to this scheme.

The Applicant also states in the air quality section of the application that the flare will be used infrequently and for short periods. It is usual in these circumstances for planning consent to include conditions limiting the use of the flare ... Moorland would like to draw the Council's attention to planning conditions 15, 16, 19 and 20 of planning consent NYM/2007/0901/FL.

The four conditions referred to by Moorland Energy were attached to a temporary planning permission, granted in December 2007, for gas exploration at a greenfield site now occupied by the Ebberston South well site. These are not considered to be necessary for a planning permission for gas production at the existing Ebberston Moor A well site. Of more relevance is the planning permission granted by the Secretary of State (SoS) in June 2012 for the Ryedale Gas Project. As with the Ebberston EDS, this permission allowed gas production in the NYMNPA and gas processing with an enclosed ground flare system. The SoS did not attach any conditions which placed any restrictions upon gas flaring. Viking considers that this permission is of more relevance than the historic exploration planning permission, and that no conditions are required to restrict flaring operations.

The overriding application of the conditions imposed upon Moorland's are not applicable as they relate to the flow testing and production test and therefore are the extremes of the operating conditions during testing.

Condition 15 is not applicable to normal plant operations. Gas flaring must be available at all times to ensure safe integrity of the plant. The particular application relates to drilling and testing operations and not to a process system with limited complexity and emissions.

Wind speed limitation is unacceptable for safety reasons. Flow rate will be operated at a rate less than 10 million cubic feet day with the exception of emergency conditions (max. duration 1hr). State of the art flare systems will be incorporated and approved supplier's will be used. Bunds are not required as the system incorporates an enclosed below-ground flare knock-out drum and recovery system. The plant will operate throughout the year and flaring will be necessary for safe operation, or under controlled conditions for limited periods of time.

The flare location is clearly shown on the plan included in the application at a safe location from the plant in accordance with good engineering practices and codes.

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Stringent precautions have been included to avoid smell nuisance and gaseous pollution during normal operations, including recovery of scrubbed waste gases utilized for production of power and utility systems. Minor emissions will occur during loading of intermediate solvents and condensate to road tankers for short periods of time and these emissions will be in controlled operation via the flare for short periods of time. All intermediate solvents and condensates will be handled in enclosed systems. Facilities have been included to capture spills. Accidental spillage will include applications of sodium hydroxide or sodium hypochlorite to reduce smell from any mercaptans present.

Item 3 – Air Quality

The Applicant also states in the air quality section of the application that the flare will be used infrequently and for short periods ('9.90 Due to the very limited anticipated frequency and duration of any gas flaring'). It is usual in these circumstances for planning consent to include conditions limiting the use of the flare. Typically these either impose limits on the times of day or week when the flare can be used or a constraint on the maximum number of hours the flare can be used each month or year and the prevailing conditions e.g. wind speed, when flaring is permitted. To enable a sensible limit to be imposed by the determining authority or recommended by statutory consultees, the Applicant needs to provide an estimate of how many hours a year the flare will be used. Moorland would like to draw the Council's attention to planning conditions 15, 16, 19 and 20 of planning consent NYM/2007/0901/FL, a copy of which is attached as Appendix 1.

Viking UK Gas' Response:

Moorland Energy's letter quotes para 9.90 of the Ebberston Moor EDS Air Quality ES chapter but misses the main assessment of flaring that has been undertaken. Paragraph 9.61 of Chapter 9 (Air Quality) of the Ebberston Moor EDS ES states that a qualitative assessment of flaring emissions and effects has been undertaken. Para 9.88 sets out the flaring parameters that have been assessed - once a month for up to an hour (i.e. 12 hours a year). It is also stated that the flare would have a thermal output of less than 20MW. The EA guidance on assessment of point sources is quoted, justifying the fact that detailed modelling is not required. The ES is considered to be robust in this respect.

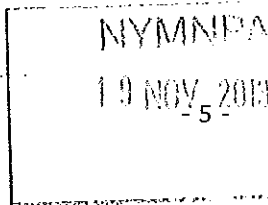
Item 4 - Other Waste Products

The EPR's reach into the plant may also extend further than suggested to incorporate the other combustion process (i.e. the generator and the boiler) as well as the partial treatment of the waste products produced on site (i.e. the waste water and condensate from the separators and the amine and glycol). The planning application gives no details as to how the Applicant wishes to treat these waste products (other than saying they may want to re-inject water back into a well at some later date). If any of these waste products after processing is released into the environment, whether at site or off site, then this will also require a permit under EPR.

The Applicant should make it clear whether the remote amine and glycol regeneration plants are operated by the Applicant or if these sites are operated by a third party. In addition, the Applicant should provide further details of the remote processing plant to enable the Environment Agency to make an assessment as to whether these processes need licences under the EPR.

Viking UK Gas' Response:

Viking UK Gas has engaged with specialist transportation companies, operational management specialists and reprocessing of intermediate solvent specialists who are experts in this area and have written verification that these materials are standard materials transported within the industry from facilities both onshore and offshore. Due to the confidential nature of the agreements between these companies and Viking UK Gas, and the fact that Moorland are in competition with Viking UK Gas in this region of the UK, such disclosures would be commercially sensitive.



Item 5 - Water handling

Since the production of water from the well is inevitable, water production has been a feature of all wells previously exploited in the license area, the absence of any assessment of the impact of disposing of the water into the ground is a significant omission. The water separated as part of the gas treatment process cannot be regarded as 'clean' as it will contain significant ionic contamination (e.g. dissolved metals such as iron and other elements). This contamination will need to be removed before it is disposed of to any receptor (surface water or disposal well).

Viking have been working extensively with the Environmental Agency and specialist water consultants to verify the suitability to dispose the produced water as described above. The present situation is that justification has been explained to the Environmental Agency that the disposal meets the requirement not to contaminate "clean" water. Final approval is awaited.

The Applicant must make a clear assessment of the impact of such water disposal in the ES if disposal of the water in this way is the planned mode of operation. This assessment should include details of how the Applicant intends to ensure that the water to be re-injected is free of contaminants, which will likely require further processing to that described in this application, and also seek the views of interested stakeholders in this aspect of the development.

If the disposal of water in the manner outlined is not to be considered in this ES then the Applicant should clearly state the impact on the development and its ES were consent to dispose of the water at a later date to be declined. The Applicant should not be able to fragment the planning process into iterative incremental applications.

Viking UK Gas' Response:

The ESs made clear that water disposal were not part of either application. Separate planning applications will be required to enable one of the consented 'appraisal boreholes' to be used for water disposal. They also stated that water handling will be assessed once the additional information has been obtained.

Since the Ebberston Moor EDS planning application was submitted to the NYMNEPA in July 2013, considerable progress has been made in agreeing the technical aspects of injecting produced water into the Sherwood Sandstone with the Environment Agency. As a result of these discussions, separate Addendums to the Environmental Statements for both the Ebberston Moor EDS and the EMA-Knapton Gas Pipeline has been prepared. Each of these include a chapter which assesses the environmental impacts of handling water disposal. Viking is confident that these two addendums assess the impacts of the disposal of produced water arising from the production of gas from the Ebberston Moor A wellsite.

Item 6 - Technical description of development

The application describes the removal of hydrogen sulphide via an amine contactor and that this is to be housed within the gas processing building which has a maximum height of 8.5m. Amine contactors are arranged as vertical columns with the downflowing amine solution absorbing H₂S and CO₂ from the upflowing sour gas to produce a sweetened gas stream. (It is normal for the rich amine produced as part of this process to be regenerated on site to be reused in the process although it is noted that this is not the intent of the Applicant in this instance as the rich amine will be transported off site.)

In the view of Moorland Energy it is not possible to process the sour gas through an amine contactor within the constraints of a 'traditional agricultural building' and the Applicant should be asked to describe the chemical process for sweetening the gas in order to evaluate the feasibility of the proposed development. Attached at Appendix 2 is a brochure for an amine gas treatment system for a similar volume of gas which includes an amine contactor with a height in excess of 20m.

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In general the description of the proposed development contains very little detail of the infrastructure expected to be installed at the gas processing site. The development is of an industrial nature and the detail of the equipment to be installed, whether inside or outside of the gas processing building, should be provided by the Applicant. Only with this level of detail will it be possible for the Council to determine whether those environmental impacts identified in the ES are sufficient.

Viking UK Gas' Response:

Obviously, Moorland and their technical advisors have not investigated and interrogated the innovative process technique developed by Viking UK Gas adequately to the gain a full appreciation of the proposal. Viking UK Gas has provided adequate information within the Ebberston Moor EDS ES which describes the chemical process for sweetening the gas. Viking UK Gas evaluated similar standard units as described in Appendix 2 of Moorland's letter and considered them not suitable for the Viking UK Gas development and these were subsequently rejected. A purpose built design has been adopted.

The description of the proposed development within the Ebberston Moor EDS ES contains adequate detail of the infrastructure expected to be installed at the gas processing site because the facilities have been reduced to a minimum by removing the necessity for regeneration of the Amine and the Glycol solutions. This proposed development is of a limited industrial nature and the adequate detail of the equipment to be installed, whether inside or outside of the gas processing building, has been provided by Viking UK Gas. Furthermore, Viking UK Gas considers the level of detail provided is sufficient for the Park Authority to assess the environmental impacts and determine whether the proposed mitigation measures identified in the ES are sufficient.

Item 7 - Traffic Movements

A further area of concern is the Applicant's assessment of traffic movements to and from the site. The planning application provides few technical details on the physical parameters of the gas stream (e.g. gas pressures and temperatures at different points in the process). However natural gas can have a water content of up to 300 lb/mmscfd. Assuming the Applicant uses Tri Ethylene Glycol ('TEG') to dehydrate the gas, a TEG unit will require a feedstock of approximately 3 US gal/lb of H₂O to be removed from the gas. Assuming 98% removal of water this means that the plant could require up to 55 metric tonnes of TEG per day. This dehydration process could yield up to 2 tonnes per day of water resulting in 57 metric tonnes of combined TEG/water mixture that needs to be removed from the site each day.

With respect to the removal of hydrogen sulphide ('H₂S') it appears that the Applicant may be underestimating the vehicle movements to transport clean and contaminated amine to and from the site. Assuming the Applicant will be using Methyl diethanolamine ('MDEA') to remove H₂S the plant could require 65 US gal/hour of MDEA to remove the H₂S. This translates into a volume of 6 tonnes per day of MDEA feedstock and an equivalent volume of MDEA containing the absorbed H₂S.

In summary between these two processes alone the Applicant may need to move up to 61 metric tonnes of feedstock onto the site and 63 tonnes of feedstock off the site each day.

This volume of material cannot be moved with '2nr two-way daily deliveries and removals' with a '4x4 maintenance staff vehicle' as claimed by the Applicant. This volume of material will need at least 38nr two-way daily deliveries and removals with a 4x4 maintenance staff vehicle. It is more likely that the Applicant would require at least 2nr two way daily deliveries and removals with a 27,000 litre tanker and at least twice a week this would rise to 3nr of such vehicle movements a day.

Viking UK Gas' Response:

Although a further area of concern highlighted by Moorland is the Applicant's assessment of traffic

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movements to and from the site, the planning application includes sufficient technical detail for planning purposes and does include an assessment of traffic movements which are based on site surveys and technical evaluation.

Moorland's assessment of the natural gas having a water content of up to 300 lb/mmscfd is completely spurious and therefore all the subsequent calculations are incorrect. Moorland use a generic figure for water content in gas, based purely on extreme conditions which cannot be substantiated. Viking UK Gas maintains that the process calculations are 'robust' and have been verified by independent engineering specialists.

Viking have calculated that the Amine and the Glycol requirement is much less than 18m³ (~18T) and the produced Condensate is less than 10m³ (~10T) per day. An independent transportation specialist (commissioned by Viking) has verified the movements to be less than two vehicle movements per day.

Item 8 - Temporary Consent Concerns

Another key concern is that whilst planning application reference NYM/2013/0477/EIA states that the gas conditioning facility would be for a temporary period of no longer than 5 years, we consider that the proposed development should be assessed as a permanent facility.

Viking UK Gas' Response:

In the pre-application discussions with senior officers at the Park Authority, Viking UK Gas made the case for a seven year planning permission to allow for the possibility that it could take up to two years before the Ebberston EDS becomes operational. A proposed change to Condition 1 to enable the permission to be granted for seven years was discussed by Members at the Planning Committee meeting held on 17th October 2013. Whilst Members decided to keep to granting planning permission for five years, officers felt that if necessary, the Applicant was entitled to seek an extension of the permission and that any application would be considered on its merits.

Viking UK Gas is aware that the Knapton Generating Station has a temporary permission which expires in 2018. Before that date, Viking UK Gas will seek to extend the planning permission for a further period of time. Any future application will be considered on its merits at that point in time. Viking UK Gas maintains that the planning application is for a temporary facility for 5 years. It is irrelevant whether Moorland consider it to be a permanent facility or not, as it is not the objective nor the purpose of the Viking UK Gas planning application.

The significant investment in the proposed long term pipeline route sought under application reference NYM/2013/0593/EIA is unlikely to deliver economic returns higher than the established gas processing facility. It is unlikely that the investment case for constructing the pipeline to KGS and decommissioning the gas processing facility on Ebberston Moor will be attractive once the initial 5 year period has elapsed and it is very likely that Viking UK will seek an extension to the temporary consent, if granted by the council.

Indeed, evidence elsewhere is that no gas conditioning facility in the UK would operate only for 5 years. The ES itself also sets out two scenarios, one of which is to extend the life of the development being proposed, which would prolong the life of the gas conditioning facility within the National Park.

Further, in determining planning application reference NYM/2007/0901/FL for gas production and electricity generation at Ebberston Common Lane, Snainton, NYMNP stated their preferred option being to pipe gas from the site of extraction to a gas processing facility outside of the National Park where it can be stored/transported/utilised for electricity generation (see Appendix 3). These concerns have not been given the same consideration in respect of current proposed development, which seeks to undertake operations of a similar scale within the National Park for a minimum of 5 years.

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Should the gas conditioning facility ~~cease~~ operation following 5 years, it will be necessary for the Applicant to utilise the Knapton Generating Station (KGS). This itself is subject to a temporary planning permission that is due to cease operation in 2018. There is therefore a presumption that planning permission will be granted to extend the life of the KGS planning permission.

We therefore query the validity of the long term business plan for the proposed development, given that both scenarios rely upon the continued extension of temporary planning permissions. Whilst we are aware that commercial concerns are not necessarily legitimate planning arguments, they are when it is clear that, commercially, such activity is not possible on a temporary basis. Should the outcome be that permission is granted for the proposed development, we strongly request that the gas conditioning facility permission is temporary – and that the expected subsequent applications to extend the life of the proposed gas processing facility are resisted.

Viking UK Gas' Response:

Viking UK Gas has applied for the planning of this temporary facility in order to de-risk subsequent business plans, some of which have not been disclosed and are commercially sensitive. At this time it is not the intention to extend the temporary planning applications and future developments will be subject to the actual economics of the field and the Knapton Generating Station which are part of ongoing evaluations.

Viking UK Gas stands by the present position that this is a temporary facility of 5 years.

Item 9 - Lack of Alternative Considerations

The major test for development within the National Park has been failed as the applicant has failed to demonstrate need for the gas processing facility or the pipeline. On this basis alone planning permission should be refused.

Viking UK Gas' Response:

The Planning Statements accompanying both the Ebberston EDS and the Ebberston-Knapton Pipeline Planning Applications set out the need for new gas infrastructure, of which the proposed developments are important elements. Both Planning Statements also demonstrate that the proposals satisfy the major development test in demonstrating the need for the development, the cost and scope of developing it elsewhere and any detrimental effects on the environment. Although the Ryedale Gas Project has planning permission and is a possible alternative, no application has been submitted to either determining authority to enable any of the pre-commencement conditions to be discharged. The timing of the project is, therefore, uncertain and implementation likely to be some time away.

Viking UK Gas has proposed a development that is a temporary facility, in the form of the Ebberston Moor EDS, which will produce natural gas reserves in a way that will de-risk a subsequent more substantial project, namely, the pipeline between Ebberston and Knapton. The aim is to produce indigenous gas to increase security of supply and reduce dependency of the UK energy sector to import gas.

The many objections of the local community to Moorland's Ryedale Gas Project demonstrated that there was a substantial support for locating the gas processing facility Project inside the National Park, notwithstanding the Park Authority's policy to resist such proposals. Viking UK Gas has taken account of these wishes and has proposed a temporary development which is demonstrated to be non-evasive.

The Applicant identifies that there are no realistic alternative locations for the development outside the National Park however consideration has not been given to the gas processing facility and pipeline infrastructure that has been approved at Ryedale (North Yorkshire County Council Application Reference NY/2010/0159/ENV). This development already benefits from planning

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permission and has a consented pipeline, with an operational life of approximately 20-25 years and would have more than sufficient capacity to process the Ebberston gas reservoir.

It is therefore the case that the negative issues presented with this option would not arise as the gas would be processed at Ryedale.

Viking UK Gas' Response:

If the Ryedale Gas Project was actually in operation this may be relevant as an option. However, Moorland has not started or planned construction to this date.

Item 10 - Pipeline length

The Applicant proposes a pipeline route that is 15.4km in length; however this has not been finalised and is subject to change, particularly as the proposed route runs within the easement of Moorland's approved pipeline before diverting away and crossing Moorland's approved pipeline further down the line. It is highly unlikely that the pipeline will be allowed to run within these easements and there is therefore good reason to believe that, once finalised, the pipeline would extend beyond the 16km threshold of Nationally Significant Infrastructure Project and would be subject to an alternative consenting regime. Alternative routing options to overcome easement and land ownership issues have not been given any consideration by the Applicant and the Council should consider whether the matter should be referred to the Secretary of State via the Planning Inspectorate.

Viking UK Gas' Response:

The aforementioned statement is incorrect on several aspects. Firstly, the proposed pipeline route has been finalized and Viking UK Gas can confirm that the route falls outside the current pipeline easement granted by landowners to Moorland Energy. Secondly, planning applications for 'local' pipelines (less than 16km) have a restriction as regards the precise route, which was adequately detailed on the alignment sheets and submitted with the application. Lastly, in the event of the necessity to deviate from the proposed pipeline route for whatever reason, a subsequent planning application would be submitted based on the articles as defined within the Pipe-lines Act 1962.

Item 11 - Risk to Safety and Security

As part of the planning application for the approved nearby Ryedale Gas Project Moorland submitted a Safety Report that considered issues including major hazards and safety during operation and maintenance. It is suggested that a similar report is submitted for the Ebberston site to ensure that appropriate practices are in place should any incidents occur.

Viking UK Gas' Response:

A safety report was prepared and submitted for both the Ebberston EDS and the Ebberston-Knapton pipeline applications.

The Ryedale Gas Project is much more complex than the proposed Viking Temporary facilities at Ebberston Moor. This facility will be remotely controlled from the Knapton Generating Station using a state-of-the-art SCADA and Distributed Control system. The facilities are similar to facilities installed elsewhere in the UK and, as it excludes all reprocessing facilities, the safety risks are substantially reduced.

Equivalent details have not been provided for the Ebberston Gas Processing Facility which, given the nature of the development, is a concern that has not been sufficiently addressed or considered.

The Ryedale facility also includes an administration building containing a control room and CCTV facilities, as well as security fences around the perimeter of the gas processing site and security

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fencing and CCTV at the well site.

During the operational phase of development around 20 workers will be employed at the site, including a site manager, who can ensure the safety and security of the operations. This will minimise the potential for antisocial behaviour towards the facility whilst also allowing a swift and appropriate response to any incidents. It is highly unlikely that the 3 operational jobs that will be created at the Ebberston facility could provide an appropriate level of security.

Viking UK Gas' Response:

The proposed facilities do not include an administration building as Viking UK Gas will administer the facility from the existing administration building at Knapton Generating Station. Controls will be linked by a remote controlled System Control and Data Acquisition (SCADA) system to Knapton with additional CCTV systems monitoring security. Daily site visits by operational staff will be required for loading/unloading and maintenance.

Moorland's objection regarding the level of site personnel is based on the assumption that the process facility will be operated on a similar basis to that described in the Ryedale Gas Project. This assumption does not take into account the limited process facilities on site. The existing operations at Knapton Generating Station will support the facility, in a similar way to the existing operations in the Vale of Pickering operated by Viking UK Gas for some 20yrs.

It is our view that these representations raise additional issues to those discussed at Planning Committee on 17 October 2013, prior to the end of the set consultation period. We therefore request that the application is taken back to Planning Committee for further detailed debate prior to its determination.

Viking UK Gas' Response:

Viking considers the aforementioned representations to be unfounded and do not raise any additional issues to those discussed at Planning Committee on 17 October 2013. However, if officers consider that Members of the Planning Committee should have the opportunity to discuss the concerns raised by Moorland Energy, Viking UK Gas would accept this in order for any decision to grant temporary planning permission to be robust and withstand potential legal challenge.

Yours sincerely

PAUL FOSTER

Director

cc John Dewar
Chris France
Alan Goforth