

Cora Molloy, Derryherk, Knockvicar, Co. Roscommon,

To: E. Murtagh, Project Manager Petroleum Safety Framework CER The Exchange, Belgard Squ. N. Tallaght Dublin 24

Derryherk, Sep. 24th, 2011

Re: Consultation Paper on the High Level Design of the Petroleum Safety Framework CER/11/137 (12)

Dear Mr Murtagh,

I presume that I would have had to register my submission and that there are all sorts of structures required to be consulted. I understand the merit of an orderly approach to the matter, believe me I do. The reality is that we, ordinary people living in what is now known amongst the frackers as the “Lough Allen Basin” (n.b. how that creepily abbreviates to LAB), have had less than three months to get our heads around the fact that we might have drill pads every 2 km connected with a labyrinth of service roads busily frequented by a fleet of lorries bringing rigs, cement, chemicals, a couple of billion gallons of water or driving off with polluted, now called processed (n.b. the harmless association to food) water and their harvest of unconventional gas. The shortness of time coupled with the absence of broadband has left me personally unable to read your 140p. document and follow your protocol; this by way of an apology.

Regardless of this self-disqualifying start I wish to make just 5 points that I would like to see you responsibly take on board in a regulatory framework to govern safety of the gas and petroleum industry in relation to their endeavour to hydraulic fracturing in this country.

1. Prohibit the use of any chemical in the fracking process, not just for the initial frack but for every subsequent one regardless of time elapsed. Do not believe in self regulation concerning this point.
2. Enforce independently conducted study runs to investigate the limitations and/or effects (subsidence, tremors, fault-shifts) of hitherto unused pressure intensity in a pure water/sand fracking process.
3. Regulate in detail the storage, de-contaminating, removal and disposal of processed water. Commission a separate and independent study into what the remaining roughly 50% of pumped in sand/water/chemical mix “does”, that refuses to come back up.
4. Commission a long term study on the paramount safety of the water table in the Shannon Region taking into consideration that the population are frequenting a decentralised, local to micro structure of water supply. The industries self-laudation of having solved the leakages of methane, processed water, radon and radium into waterways or the atmosphere to an indefinite point in the future by employing a new generation of “magic” concrete must be questioned sharply.
5. Infrastructural and traffic questions, though not intrinsically your remit, must become a health and safety issue when it involves transport of toxic materials

through congested and wholly unsuitable country lanes. Equally the looming possibility of a pipeline would surely require your severest regulation.

I promised but 5 points and believe me, that is all you need. If you commission thorough, long term and independent studies into the environmental health and safety issues outlined above and charge the gas industry with the costs, because theirs is the burden of proof, before the government even considers turning their option licenses into exploratory licenses one of three things will happen:

- the fracking industry will realise that this project is not worth their while because they need fast profits
- the studies will show that hydraulic fracturing is an unsafe process
- the regulatory frame work will grow to such a mountain that it would require its own fleet of lorries.

I hope that you will take this submission on board despite its lack of form. Please get back to me on the points I have raised at your own convenience. Kindest regards and good luck with your task