

Eamonn Murtagh

From: simon
Sent: 28 September 2011 09:41
To: Eamonn Murtagh
Subject: CER 11/137B Dangers of Fracking for local population

To: emurtagh@cer.ie

Subject: CER 11/137B

Please find the list of proposed questions and comments to CER 11/137B attached

Regards

- > I feel that the safety framework is fundamentally flawed as it doesn't
- > appear to have considered the risks related to hydraulic fracturing
- > for shale gas.
- > The document focuses on 'Major accident hazards' which really only
- > consider things like explosions where there is a risk of immediate
- > loss of life. It also only considers something a risk of a major
- > accident hazard if it is connected directly to the gas reservoir.
- > Therefore a spill of produced water from a tank would not be
- > considered a major accident hazard.
- > It is unclear from the document who is ultimately responsible for
- > petroleum safety, there is a lot of talk about co-operation with other
- > agencies but there is no clear definition of where responsibility lies.
- > The mission statement for the document is too narrow. There is a goal
- > that ' Petroleum undertakings achieve safety performance commensurate
- > with the best internationally' given that there seems to be no best
- > practice worldwide this is a very weak goal for fracking.
- > There is lack of logical progression between the way the CER designate
- > activities and the way they intend to implement the the permissioning
- > system.
- > The document is industry focused and doesn't place enough emphasis on
- > overall risk to the public.