



Meeting note

File reference	EN030002 Keuper Gas Storage Project
Status	Final
Author	Ewa Sherman
Date	22 January 2015
Meeting with	Keuper Gas Storage Limited (the applicant)
Venue	Teleconference
Attendees	The Planning Inspectorate Tom Carpen – Infrastructure Planning Lead Richard Kent – EIA and Land Rights Advisor Ewa Sherman – Case Officer Steven Parker – Assistant Case Officer Keuper Gas Storage Limited (KGSL) Richard Stevenson – INEOS Enterprises Ltd Robin Craig – INEOS Enterprises Ltd Dave Peterson – INEOS Enterprises Ltd Rosanne McGuigan – ERM Paul Zyda – Zyda Law Victoria Longmore – Zyda Law
Meeting objectives	Geology teleconference
Circulation	All attendees

Introduction

The Planning Inspectorate (PINS) outlined its openness policy and advised that a note of the teleconference will be published on the project website according with s51 of the PA 2008. Additionally, it was made clear that any advice given did not constitute legal advice upon which the applicant (or others) can rely.

Summary of key points discussed and advice given

PINS stated that the purpose of the meeting was to understand how KGSL have considered the NPS requirements in relation to geology. Ahead of the telecon the applicant submitted Geology Matrix document which presented their compliance with the requirements of the National Policy Statement for Gas Supply Infrastructure and Gas and Oil Pipelines (EN-4) in relation to the proposed development.

The applicant also submitted draft geology reports prepared by Geostock.

KGSL emphasised differences between the proposed Keuper Gas Storage Project and the Preesall Saltfield Underground Gas Storage (reference number EN030001) project

which has been through the examination process and is currently being re-determined by the Secretary of State following a judicial review process.

PINS advised that Preesall had been the only project of that type submitted to the PINS under the Planning Act 2008 regime. PINS advised that it would not be possible to provide a firm view on the acceptability of the amount of the preparatory work done before the submission of the Development Consent Order (DCO) application as this would be undertaken at the examination stage. However, PINS would be able to provide advice regarding the level of detail in the draft application documents without prejudice to any future examination.

KGSL advised that having reviewed the Preesall application and examination documents it considered it was providing substantially more detailed geological information specific to the application site, in an area where underground gas storage has operated successfully since the 1980's.

The applicant introduced the geology matrix which as a starting point was based on the following requirement of the NPS EN-4:

1. *'Applicants should undertake and supply to the [IPC], a detailed geological assessment to demonstrate the suitability of the geology at the site for the type of underground gas storage proposed (EN-4 paragraph 2.8.9).'*

PINS advised that two draft geology reports seem to provide clear information on the suitability, feasibility and safety of the proposed site. However, PINS sought the applicant's view of what makes this particular type of salt suitable to storing of gas.

KGSL explained that between blocks of rock of Triassic origin there are 250 m of uniform block of salt, interspersed with marl bands, that can be solution mined. It is sufficiently deep so surface and ground water doesn't dissolve it, and sufficiently shallow so it can be mined. It is left untouched until the brine mining starts. Salt is located deeper underground towards the south of the site and the pressure in the cavities is similar to that of gas which is moving in the transmitter pipes therefore preferable for the gas storage as it would not be necessary to over compress during the storage process.

The applicant advised that its 'Assessment of Geological Suitability, Preliminary Design and Safety' draft report demonstrates that area of salt is clear of any features for the cavity locations currently proposed. Where features were found, cavities have been relocated.

Due to commercial sensitivity, KGSL intends to submit detailed extracts rather than a full interpretation of the wider area. However, less detailed 3-D images of the full geological interpretation have been included in geology reports and the full interpretation of the wider area has presented to the stakeholders at the public information days. PINS advised that it would be for the Examining Authority to ask additional questions regarding the wider area and the applicant to have regard to any responses received requesting information at the pre-application stage; however, at this stage that approach appears to provide sufficient information for people to understand the proposed project.

2. *'When considering storage in a salt cavity, the geological assessment should include depth below surface, salt thickness, salt purity and presence of shale bands which could affect cavern design (EN-4 paragraph 2.8.9).'*

The applicant provided explanation of the method the seismic surveys have been carried out by Tesla Exploration Ltd in November 2013 at the proposed site.

PINS enquired whether it would be possible for any Examining authority to see comparison between actual drilling data and previous results of the seismic surveys carried out at the Holford Brinefield. The applicant confirmed that although that work has been done informally, the data would be available if required.

The applicant confirmed that the seismic survey results provide comprehensive studies and combined with data from the caverns within the fields (D2A), had shown the purity of the salt in this part of Cheshire. Layers of salt and marl were shown to go right up through the strata, like a barcode and this was consistent across the Holford Brinefield, demonstrating uniform characteristics of the salt.

In response to the query about doing a bore hole test, KGSP said that this is not required at this stage as borehole data is available from wells that are within the matrix of the KGSP wells and is sufficiently good for the current design level at this stage and so no new information would come from the bore holes. PINS advised that it may be worth explicitly stating this position in the geology report to demonstrate how far the exploratory work has gone.

PINS questioned the impact of the 30 foot layer of marl shown in the reports and its effect on cavern design. The applicant advised that there was clean salt below the marl and when a sump was created in the salt the marl then falls into the bottom of the cavern. Consequently some space in the cavern is lost by this process but this has been included in the estimates and accounted for in the cavern design at the top. The available data demonstrates that this does not cause any issues regarding gas tightness.

Documents update

PINS advised that it would be beneficial if the applicant continued work towards completing the Statements of Common Ground (SoCG) with the local authority Cheshire West and Chester Council (CWCC) and the Environment Agency (EA) which would assist in understanding these stakeholders' views on the approach taken by the applicant. KGSL confirmed that a meeting with LA was scheduled, to be followed by the meetings with the EA and the Health and Safety Executive (HSE).

The applicant confirmed that they have prepared a draft pre-construction COMAH report for review by the HSE which demonstrates that the site is appropriate for gas storage, based on the preparatory work that has been done. KGSL also confirmed that a draft hazardous substances consent application has been submitted. PINS advised that during the examination stage the Examining Authority might ask further questions from the HSE; however, at this stage all parties have to be clear what is reasonable for the HSE to do in relation to the assessment of issues.

Specific decisions / follow up required

- PINS will contact Health and Safety Executive to clarify the role they can take in the DCO process, distinct from COMAH (Control of major accident hazards Regulations 1999)
- The applicant confirmed they will submit draft DCO application documents, including Statement of Reasons and Funding Statement, by the end of the week for review. The applicant also advised that they are finalizing draft HRA Report which will be sent to PINS and Natural England for review / comments.

- Further meeting will be arranged to discuss review of the draft application documents, especially the draft DCO and Consultation Report.
- Regarding the query about arranging a site visit (ASV), PINS advised that it would not be needed given the remaining time / work before submission.