

Sub No 25

Chapel Street,
Belmullet,
Co. Mayo.
16th February, 2006.

EPA Headquarters,
Johnstown Castle Estate,
Wexford.

For the Attention of Ms. Ann Marie Donlon.

Dear Ms. Donlon,

Re: Reg No. 738 – Further Information Response

With regard to Shell's response (8th August, 2005) to EPA's Request for Further Information (1st March, 2005) I find certain information supplied to to be both evasive and misleading.

In particular, the diagram supplied (p.19) fails to demark horizontal grid units. The content consequently provides only a very crude guide, and the label for 'Year 1' is plainly misplaced.

Likewise the text fails to be consistent with facts and figures supplied elsewhere in Shell's documentation to the EPA. The figure given for expected condensate levels is put at 0.05bbl/MMscf whereas in its Application Form this ratio is consistently put at 0.5bbl/MMscf (see pp. 13, 47 & 78). This error is crucially significant in light of the question asked.

As a typographical error it would be serious enough. However, in relation to the previous question (p.18), and the definition supplied for bbl/m³ this error is twice repeated and is all the more questionable in this context since such translation effectively eclipses the original error.

I cannot accept that such inaccurate and sloppy work represents normal practice, especially in such a technically-based matter and in response to specifically requested elaboration of previously sanctioned data. It is the kind of 'error' which has been a hallmark of submissions to the various Planning /Protection agencies throughout the Corrib permissions process.

Since the current Application was made in late 2004 only some answers have to date been submitted to the Further Information requested, despite contingent statutory time scales and sanctioning options. Leniency by Planning /Protection agencies is clearly perceived as license, and appellants' queries are construed as obstructive interference. Where is the referee?

Mr. Pyle, Managing Director, signed off on the current Application as being "truthful, accurate and complete". Submissions by third parties were made on this basis, will you please therefore refer this section of the Response back to Shell for thorough revision and prompt re-submission.

Yours sincerely,

Imelda Moran.