AN BORD PLEANÁLA
TIME
3 1 ... 2004
LTR. DATED ... FROM
PL

P03/3343

SHELL E. & P. LTD., BELLANBOY TERMINAL

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AN BORD PLEANÁLA
TIME
3 1 MAY 2004
LTR. DATED ... FROM
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TIME
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Oifig an Aire
Office of the Minister

AN ROINN COMHSHAOIL, OIDHREACHTA AGUS RIALTAIS ÁITIÚIL
DEPARTMENT OF THE ENVIRONMENT, HERITAGE AND LOCAL GOVERNMENT

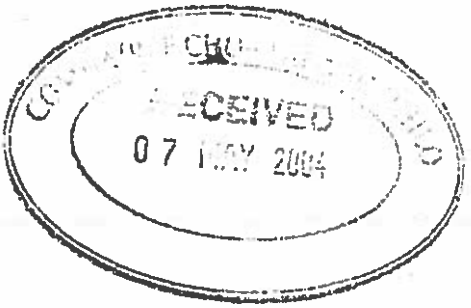
Please Quote Ref: REP3042/MC/04

6 May, 2004.

AN ROINN COMHSHAOIL
AGUS RIALTAIS ÁITIÚIL
DEPARTMENT OF
THE ENVIRONMENT AND
LOCAL GOVERNMENT

TEACH AN CHUSTAIM
BAILE ÁTHA CLIATH 1
CUSTOM HOUSE, DUBLIN 1

Tel No: +353 1 888 2000
LoCall No: 1890 20 20 21
Fax No: +353 1 878 8640



County Secretary,
Mayo County Council,
Castlebar,
Co. Mayo

Dear County Secretary,

I have been asked by Mr. Martin Cullen, T.D., Minister for the Environment, Heritage and Local Government, to acknowledge receipt of your recent letter in connection with a planning application for the development of a gas terminal.

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Yours sincerely,

Conor Falvey,
Private Secretary

CORA
Please attach to file

EMail: minister@environ.ie
Website: www.environ.ie

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13 May 2004

Dr. T. K. Whitaker,
148 Stillorgan Road,
Dublin 4.

Dear Dr. Whitaker,

I wish to acknowledge your e-mail of the 13th May 2004 to the County Manager in connection with Mayo County Councils decision to grant permission for a Gas Terminal at Bellanaboy, Co. Mayo.

I attach herewith copy of:

(a) Mayo County Councils decision dated 30th April 2004.

(b) Report by Mr Iain Douglas Senior Planner.

(c) Disk containing the above including the Traffic Management Plan submitted on 11th March 2004 to Mayo County Council.

I trust this is the information you require and please do not hesitate to contact me if you require further assistance.

Yours sincerely,

J. Moran,
Senior Staff Officer
Planning Section.

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MAYO COUNTY COUNCIL

Telephone No.:
(094) 24444

Planning and Development Section,
Aras An Chontae, Castlebar.

LOCAL GOVERNMENT (PLANNING AND DEVELOPMENT) ACTS 1963-1999
PLANNING AND DEVELOPMENT ACTS 2000-2002
PLANNING AND DEVELOPMENT REGULATIONS 2001
NOTIFICATION OF DECISION TO GRANT PERMISSION

TO: **SHELL E & P IRELAND LIMITED**
C/O TOM R. PHILLIPS &
ASSOCIATES
8-11 LOWER BAGGOT STREET
DUBLIN 2

Ref. No. in
Planning Register:
P03/3343
Application Received
On: 17/12/2003
Validation Date:17/12/2003
Additional Information
Received On: 11/03/2004

Notice is hereby given that Mayo County Council has on 30th **April 2004** decided to **GRANT PERMISSION** to the above named, for development of land, in accordance with documents lodged, namely

Re: Planning application for the development of a gas terminal for the reception and separation of gas from the Corrib Gas Field, and for a peat deposition site, respectively.

The development will consist of the concurrent development of two sites located 11 kilometres apart, approximately, and identified as the site of the gas terminal for the reception and separation of gas from the Corrib Gas Field in the townland of Bellagelly South, Bellanaboy Bridge, County Mayo (the Bellagelly South site) and the site of the peat deposition site in the townlands of Srahmore and Attavally, Bangor-Erris, County Mayo (the Srahmore site), respectively.

the development at the Bellagelly South site will consist of: a gas terminal for the reception and separation of gas including plant and equipment; provision of 4,935 sq m (gross floor area), approximately, of buildings; access roads; 40 no. car parking spaces; and ancillary developments, of which 13 ha, approximately, will be developed in respect of the gas terminal's footprint. The proposed development of the Bellagelly South site will also consist of: the excavation and removal of 450,000 cubic metres, approximately, of peat from the Bellagelly South site, off site, to the Srahmore site; civil works, inclusive of foundations and piling; the provision of a single storey control building with a gross floor area of 400 sq m, approximately, inclusive of a control room, offices, equipment rooms, kitchenette, locker room and toilets; the provision of a single storey administration building with a gross floor area of 1,015 sq m, approximately, inclusive of a gatehouse, offices, a conference room and an emergency response room, canteen, kitchenette, laboratory, archive room, first aid room, store rooms, lockers, changing rooms and toilets; the provision of a maintenance building with a gross floor area of 800 sq m, inclusive of a warehouse, stores, mechanical workshop, welding and fabrication shop, instruments and electrical workshops, a plant room, toilets and a maintenance vehicle shed; a weighbridge; and a lattice antenna structure of 22 m in height, approximately, for site-wide radio communications. The development of the Bellagelly South site will also consist of: a diesel storage tank of 75 cubic metres capacity, approximately; a nitrogen generation unit; an air compressor package; a utility area (for plant); a power generation and switchroom building with a gross floor area of 525 sq m, approximately, for the production of electricity for the proposed gas terminal, to include 3 no. generator sets each with a capacity of 1.3 MW; an emergency generator with a capacity of 650kW; 1 no. emergency generator diesel day-tank and 1 no.

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distribution pump; a high pressure and low pressure flare tower of some 40 m in height, exi mately; a ground flare with a stack height of some 12 m, approximately; a transformer building g=ross area of 410 sq m, approximately, to include a 400v switchroom; a heating medium heater with x height of 20 m, approximately; 3 no. flare knock out drums; 2 no. low pressure gas compressors; a _n ol recovery system comprising of 1 no. methanol still of 33 m in height, approximately; a heating am storage tank with a capacity of 40 cubic metres, approximately; a sales gas compressor building a gross floor area of 890 sq m, approximately, to include 2 no. sales gas compressors, each with a 7.7 AS O rated gas turbine driver; a gas-to-gas heat exchanger; a corrugated plate interceptor; effluent re ated water sumps; a water treatment building with a gross floor area of 235 sq m, approximately, in ing a multi-media filter, ultrafiltration and nanofiltration membrane units, ion exchange beds, an ated carbon filter and a sludge treatment facility; 3 no. condensate storage tanks, of 10 m each in t, approximately, and 10 m each in diameter, approximately; 2 no. product methanol tanks of 8.4 m in diameter, approximately, and 10 m each in height, approximately; 3 no. raw methanol storage = 13.5 m each in diameter, approximately, and 10 m high, approximately; a fire water pond with a city of 7,200 cubic metres, approximately; a used firewater pond with a capacity of 5,000 cubic es, approximately; a firewater pump building with a gross floor area of 660 sq m, approximately, to ude 4 no. fire water pumps, each with capacity of 600 cubic metres per hour, approximately, and 4 no. el engine drivers, each rated at 265kW (absorbed), approximately; a finger type Slug Catcher; an inlet eiver with a withdrawal footprint of 15 sq m, approximately; a sales gas metering unit with a print of 200 sq m, approximately; an odorant tank with a capacity of 10 cubic metres, approximately; les gas pig launcher with a loading / withdrawal footprint of 15 sq m, approximately; an Onshore minal Termination Unit (OTTU) measuring 2 m long by 1 m wide by 2.5 m high, approximately; an tricity substation; a Road Tanker Loading / Unloading area; a waste storage area occupying an area of sq m, approximately; the provision of a number of pipetracks and piperacks joining elements of plant ether; the provision of 2 no. settlement ponds and associated drainage arrangements; landscaping -ks; stock proof fencing around the perimeter of the proposed development; security fencing around terminal and settlement ponds inside the stock proof fence; paved internal access roads; provision of icular access to the R314 via an improved forestry access road and the provision of entrance walls and es; the reconfiguration of the existing entrance from the site to the R314 to include the widening of the rance and the provision of a deceleration lane; realignment of the R314 to the south of its current ation, at the site entrance, over a length of 115 m, approximately, to the west of the centreline of the sting site entrance and over a length of 80 m, approximately, to the east of the centreline of the existing e entrance (over a total length of 195 m, approximately); an emergency vehicular access road to the nty road running between Pollatomish and the R314 via; an improved forestry access road; a new intenance access and maintenance road from the R314 to the 2 no. settlement ponds; and all other site vel pment works and landscaping above and below ground.

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development will simultaneously consist of the development of a peat deposition site of 117 ha, proximately, at the Srahmore site. The development of the peat deposition site will consist of: the nstruction of a hardstanding peat reception area of 5,112 sq m, approximately; the provision of a mporary administration building with a gross floor area of 108 sq m, approximately, inclusive of offices, nteen and toilets. The development of the peat deposition site will also consist of: the provision of a ntrance and access road to the peat deposition site from the R313; the construction of internal circulation utes; the construction of a surface water swale along the southern and western boundaries of the site; e provision of 5 no. surface water settlement ponds (2 no. ponds of 800 sq m each; 3 no. ponds of 400 sq each, approximately). Deposition of peat will take place within an area of 63 hectares approximately. he peat deposition site will also entail the provision of a controlled overflow area of 12 hectares pproximately; an oil interceptor; a settlement tank of 28 cubic metres approximately; the provision of a emporary weighbridge and a temporary wheelwash. The development of the peat deposition site will also onsist of 5 no. car parking spaces located adjacent to the administration building and 20 no. parking paces for haulage vehicles at the peat reception area at a site of 160 ha, approximately, in the townland of Bellagelly South, Bellanaboy Bridge, County Mayo, and a site of 117 ha, approximately, in the townlands of Srahmore and Attavally, Bangor-Erris, County Mayo - Shell E & P Ireland Ltd.

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MAYO COUNTY COUNCIL

based on the reasons and considerations as outlined in the First Schedule and in accordance with the 75 condition(s) set out in the Second Schedule attached hereto entitled "Schedule of Conditions".

Signed On: **30th April 2004**

on behalf of Mayo County Council

for COUNTY SECRETARY

An appeal against a Decision of the Planning Authority under Part VI of the Planning and Development Act 2000 may be made to An Bord Pleanala. An appeal must be received by An Bord Pleanala within **4 weeks** beginning on the date of the making of the Decision by the Planning Authority. (N.B. not the date on which the Decision is sent or received).

Appeals should be addressed to **The Secretary, An Bord Pleanala, 64 Marlborough Street, Dublin 1** and all such appeals to the Board will be invalid unless accompanied by the appropriate appeal fee. (see attached Schedule of Fees). Persons who are not parties to an appeal must pay the appropriate fee (see attached Schedule of Fees) if their submissions or observations are to be considered by the Board.

The appeal, which must be in writing, must state name and address of appellant; the details of the nature and site of the proposed development, the full grounds of appeal and reasons, considerations and arguments on which they are based, the name of the Planning Authority and must include the appropriate appeal fee as mentioned above and the acknowledgement from Mayo County Council in respect of the submission. An appeal not complying with all the necessary requirements will be rejected as invalid by An Bord Pleanala.

An appellant shall **not** be entitled to elaborate in writing upon, or make further submissions in writing in relation to, the grounds of appeal stated in the appeal, or to submit further grounds of appeal, and any such elaboration, submissions or further grounds of appeal received by An Bord Pleanala shall not be considered by it. A grant of permission shall be issued as soon as may be, but not earlier than 3 working days after the expiration of the period for the making of an appeal if there is no appeal before An Bord Pleanala on the expiration of the said period.

Please Note: In the case of a valid planning application received by the Planning Authority prior to the coming into operation of the Planning and Development Regulations, 2001, i.e. 11th March 2002, the period within which an appeal can be made to An Bord Pleanala is one month from the date of the Decision of the Local Authority.

***NOTE:-** Commercial Development is defined as development for the purposes of any professional, commercial or industrial undertaking, development in connection with the provision for reward of services to persons or undertakings, or development consisting of the provision of two or more dwellings but excludes development for purposes of agriculture.

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P03/3343 FIRST SCHEDULE.

Having regard to:

(a) the National policy with regard to the development of energy and natural gas resources in particular;

(b) the compatibility of the proposed development with the development strategies for the Border, Midlands and Western Region within the National Spatial Strategy;

(c) the Mayo County Development Plan 2003-2009;

(d) the character of the landscape of the site;

(e) the report of the National Authority for Occupational Safety and Health, being the competent authority in relation to land use planning under Article 12 of the Council Directive 96/82EC (Seveso II),

it is considered that, subject to compliance with conditions set out in the Second Schedule, the proposed development would not seriously injure the visual amenities or landscape character of the area, would not seriously injure the amenities or property values of residential properties or farms in the vicinity, would not be prejudicial to public health, would not endanger public safety or be otherwise contrary to the proper planning and sustainable development of the area.

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P03/3343 SECOND SCHEDULE.

SCHEDULE OF CONDITIONS

GENERAL.

1. The development shall be carried out in accordance with plans and documentation submitted to Mayo County Council on 17th December 2003, 23rd December 2003 and additional information submitted to Mayo County Council on 11th March 2004, except where amended by the conditions set out hereunder.
   Reason: *In the interest of clarity and proper planning and development.*

2. The development shall be constructed in accordance with undertakings for measures to mitigate its impacts as set out in the Environmental Impact Statement lodged with Mayo County Council on 23rd December 2003 and in the additional information received by Mayo County Council on 11th March 2004 except where amended by the conditions hereunder.
   Reason: *To mitigate against any adverse environmental impacts resulting from the construction and operation of the development.*

3. Prior to the commencement of development the owners/developers (and their successors in title) shall enter into legally binding agreements and covenants with Mayo County Council pursuant to Section 47 of the Planning and Development Acts

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2000 – 2002. These agreements and covenants shall provide inter alia for the following:

(i) To give effect to all undertakings given by the applicant and the requirements of Mayo County Council in relation to the landscaping of the site, to the maintenance and/or replacement of existing trees and provision of new planting to provide a permanent visual screen as shown on the Landscape Strategy (Shell Drawing No.'s COR-RS-LA-001, 002 and 003) submitted to Mayo County Council on 23rd December 2003.

(ii) The payment to Mayo County Council of all costs incurred by the Council on the repair, maintenance and rehabilitation of the road network arising from construction of the development and as determined by the road and bridge survey carried out prior to and post construction.

(iii) To ensure that all plant shall be disassembled and removed and that the site shall be restored to the satisfaction of Mayo County Council following the cessation of operations at the plant.

(iv) To ensure that the Transport Management Plan submitted on the 11th March 2004 and any amendments required by Mayo County Council is implemented.

(v) The acceptance by the developer of the composition, terms of reference and functions of the Project Monitoring Committee subject of Condition No. 16.

Reason: *To ensure the satisfactory completion of development authorised by the permission.*

ROADS & TRAFFIC MANAGEMENT.

Road Improvements.

4. Prior to the commencement of peat haulage operations and the importing of construction materials into the Bellanaboy site the developer shall, at its own expense, realign Regional Road R-314 in accordance with Mayo County Council Drawing No. 3225/04/02. The realignment shall be carried out under the supervision of Mayo County Council to an agreed design and specification.
Reason: *In the interest of traffic safety.*

5. The existing road side boundary along Regional Road R-314 at the proposed entrance to settlement ponds at the Bellanaboy site shall be set back in accordance with Mayo County Council Drawing No. 3225/04/03. The area between the edge of the carriageway and the new set back boundary shall be made level with the existing carriageway.
Reason: *In the interest of traffic safety.*

6. The maintenance, repair and upkeep of the strengthened haul routes Regional Road R-313, Local Roads L-12044, L-1204 and Regional Road R-314 from Bellanaboy Bridge to the main terminal entrance and all other roads in the region which are affected directly or indirectly by the proposed development throughout the construction period, shall be carried out by Mayo County Council and any costs incurred shall be paid by the Developer.
Reason: *To ensure the proper maintenance and upkeep of roads and bridges during construction.*

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7. A road and bridge condition survey of the road network in the Erris region shall be undertaken by Mayo County Council, before and after the construction period. This survey shall determine the level of damage to the road network, if any, which would be attributable to the proposed development. The developer shall bear the cost of the survey and the cost of repairing any damage attributable to the proposed development.
Reason: *To ensure the proper maintenance and reinstatement of roads and bridges following construction.*

Traffic Management.

8. The developer shall comply with the provisions set out in the Traffic Management Plan submitted on the 11th March 2004 with regard to all aspects of transport generated by the proposed development. In particular the stated maximum number of 800 Heavy Commercial Vehicle (HCV) traffic movements per day along the primary haul route shall not be exceeded.
Reason: *In the interests of proper and efficient traffic management and residential amenity.*

9. The location of all road signs, advance warning signs, information signs according to the schedule set out in the Traffic Management Plan submitted on the 11th March 2004 shall be agreed with Mayo County Council prior to the commencement of haulage of any materials.
Reason: *In the interests of proper and efficient traffic management and traffic safety.*

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Haul Routes.

10. Haulage of all materials required for the construction of the development at the Bellanaboy site shall be via Local Roads L-1204 and L-12044 and the section of the Regional Road R-314 from Bellanaboy Bridge to the main entrance to the terminal.
(i) Materials transported via Bangor shall use Regional Road R-313, the Local Road L-1204, the Local Road L-12044 and Regional Road R-314 as the haul route to the site.
(ii) Materials transported from Belmullet shall use the Regional Road R-313 the Local Road L-12044, the Local Road L-1204 and Regional Road R-314 as the haul route to the site.
Reason: *In the interests of proper and efficient traffic management and traffic safety during construction and to minimise damage to the public road system in the area.*

11. Haulage of all materials required for the construction of the development at the Srahmore site shall be via Regional Road R-313.
Reason: *In the interests of proper and efficient traffic management and traffic safety during construction and to minimise damage to the public road system in the area.*

12. The haul route and schedule of haulage for the construction phase of the development shall be clearly documented and published in a manner to be agreed with Mayo County Council. All vehicles hauling materials to the Bellanaboy or Srahmore sites

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shall have a clear notice visible to the public identifying that they are involved with the development.

Reason: *In the interests of proper and efficient traffic management and traffic safety during construction and to minimise damage to the public road system in the area.*

13. All vehicles leaving the construction area of the site shall pass through a wheel wash.

Reason: *In the interest of proper planning and sustainable development of the area.*

14. Vehicles transporting waste from the site shall operate under a Waste Collection Permit.

Reason: *In the interest of proper planning and sustainable development of the area.*

15. The developer shall ensure that no material shall leak or fall from vehicles while in transit transporting waste from the terminal site.

Reason: *In the interest of proper planning and sustainable development of the area.*

ENVIRONMENT

16. Prior to the commencement of development a Project Monitoring Committee (PMC) shall be established to monitor earthworks, surface-water run-off, drainage control, traffic management and road maintenance, implementation of the landscape plan and other environmental issues. The Project Monitoring Committee shall comprise of two representatives of the developer, two officials from Mayo County Council, one official from each of the North West Regional Fisheries Board, the Heritage and Planning Division of the Department of the Environment, Heritage and Local Government and the Environmental Protection Agency. The Committee shall be chaired by the Mayo County Manager (or his nominee) and the Committee may co-opt other members as required.

Reason: *To ensure effective monitoring during construction.*

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Protection of Water Resources.

17. Prior to the commencement of development a maintenance programme for the silt traps and settling ponds shall be submitted to Mayo County Council for agreement. Any subsequent amendments arising from the construction phase or the requirements of Mayo County Council (following consultation with the Project Monitoring Committee) shall be agreed in writing. A record of all maintenance works shall be kept and made available to Mayo County Council and the Project Monitoring Committee. The developer or its contractors shall nominate the person responsible for the operation of the silt traps and settlement ponds.

Reason: *To prevent water pollution.*

18. All surface water discharges from the disturbed area of the site shall be through the regime of settling ponds and silt traps as set out in the plans and particulars submitted on 17th December 2003, the accompanying Environmental Impact Statement

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submitted 23rd December 2003 and Further Information submitted on the11th March 2004.
Reason: *To prevent water pollution.*

19. No lime/cement binder to be used for peat stabilisation or other deleterious matter as defined in the Fisheries (Consolidation) Act 1959 shall be allowed to discharge to surface waters.
Reason: *To prevent water pollution.*

20. All fuel storage areas and cleaning areas, particularly cleaning areas for concrete trucks shall be rendered impervious to the materials stored therein or substances cleaned there-from and shall be constructed to ensure that no substance shall discharge from the area. In addition, tank and drum storage areas shall as a minimum be bunded, either locally or remotely, to a volume not less than the greater of the following:

(i) 100% of the capacity of the largest tank or drum within the bunded area; or
(ii) 25% of the total volume of substance which could be stored within the bunded area.

Reason: *To avoid the pollution of surface or ground waters.*

21. The developer shall maintain on site for the duration of the construction period an oil pollution abatement kit comprising of booms and absorbent materials. The nature and extent of the kit shall be agreed with Mayo County Council prior to the commencement of development.
Reason: *In order to prevent water pollution.*

22. The percolation area for the wastewater treatment system shall be located in position shown on Drawing No. COR-AR-SD-RF1-005 submitted on the 11th March 2004.
Reason: *In the interest of clarity and for the protection of public health.*

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Rock Blasting.

23. Blasting of rock on the site shall be designed and operated so that

(i) Ground vibration arising from any blast carried out on the site shall not exceed a peak particle velocity of 12 mm/s in any one of three mutually orthogonal planes at the threshold of any house in the vicinity of the site.
(ii) The air over pressure arising from any blast carried out on the site shall not exceed 125 dB (linear) max peak level when measured outside the nearest house to the blast.
(iii) Blasting shall be confined to between the hours of 11.00am and 5.00pm, Monday to Friday

Reason: *In the interest of public health & safety.*

24. Arrangements for the advance notice of blasting shall be agreed with Mayo County Council, the details of which shall be made available to the general public by way of public advertisement.
Reason: *In the interest of public health & safety.*

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Noise & Dust.

25. During the construction stage noise levels shall be kept to a minimum. Any activity which will elevate the pre-construction ambient noise levels by 5dB Leq shall be notified to the Project Monitoring Committee in advance. Any mitigation measures shall be put in place at least one week in advance before the scheduled activity. Advance notice of the schedule of planned activity which will elevate the pre-construction ambient noise levels by 5dB Leq shall be made available to the general public by way of public advertisement.
Reason: **In the interest of public health and residential amenity.**

26. Dust levels shall not exceed 130 mg/m^2 per day averaged over thirty days when measured at the site boundaries. Any activity which can reasonably be expected to exceed that dust level shall be notified to the Project Monitoring Committee in advance. Any mitigation measures shall be put in place at least one week in advance before the scheduled activity. Advance notice of the schedule of planned activity which will exceed the specified dust level shall be made available to the general public by way of public advertisement.
Reason: **In the interest of public health and residential amenity.**

Waste Disposal

27. No waste material, with the exception of waste material being transferred to a licensed waste facility, generated on site during the construction stage shall be removed off site without the prior agreement of Mayo County Council.
Reason: *In the interest of proper planning and sustainable development of the area.*

28. Adequate sanitary arrangements to the satisfaction of Mayo County Council shall be installed for the duration of the construction period. All wastes generated from such arrangements shall be tankered off site.
Reason: *In the interest of public health.*

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Natural Heritage.

29. The development shall be carried out so as to avoid disturbance to birds and their nesting habitat during the breeding season.
Reason: *For the protection of avian species in the area of the development.*

30. Prior to the commencement of development the developer shall carry out a baseline study of salmonid habitats in the area of the proposed development. The scope, nature and amount of monitoring of the baseline study shall be agreed with the North Western Regional Fisheries Board, the Marine Institute and Mayo County Council together with a schedule of follow-up surveys during the construction and immediate post-completion phases of the development.
Reason: *In order to provide comprehensive baseline data to permit monitoring and protection on salmonid habitats in the area.*

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31. Within 6 months of the date of this decision the developer shall submit a report, including a survey (carried out at the appropriate time of year) into the presence or otherwise in the area of breeding hen harriers together with mitigation measures to minimise disturbance during the breeding season, if breeding is recorded.
Reason: *In order to establish if hen harriers are breeding in the area and to determine the nature and extent of any mitigation measures required.*

32. Removal of vegetation within the site to be carried out outside of the breeding season.
Reason: *To ensure the protection of avian wildlife.*

Health & Safety.

33. No development shall take place on the terminal site until an adequate water supply is installed.
Reason: **In the interest of the health of persons employed on the site.**

34. All relevant paved areas shall be extended to the proposed bund walls and arranged so that any accidental releases over the bund wall are diverted to the open drains sump.
Reason: *To ensure proper environmental control in the event of accidental spillage of hazardous material.*

35. The impermeable areas around the slug-catcher shall be extended so that any potential release of hazardous material can be contained.
Reason: *To ensure proper environmental control in the event of accidental spillage of hazardous material.*

36. Online Total Organic Carbon monitoring shall be installed at the proposed silt ponds with provision for automatic re-routing of flow to the contaminated firewater pond in the event of accidental discharge to the system.
Reason: *To ensure proper environmental control in the event of accidental spillage of hazardous material.*

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Fire Safety.

37. A Fire Safety Certificate is required in respect of each building in accordance with the requirements of Part III of the Building Control Regulations, 1997. Application for a Fire Safety Certificate shall be made to the Building Control Authority. A Commencement Notice is also required in respect of each building. The Commencement Notice shall be submitted to the Building Control Authority in accordance with the requirements of Part II of the Building Control Regulations, 1997, S.I. No. 496 of 1997.
Reason: *In the interests of fire safety.*

38. Suitable and adequate provision for vehicle access to the terminal and all installations therein shall be provided to assist the Fire Service in the protection of life and property. Vehicular access for the Fire Service to each building shall be provided in accordance with Table 5.2 of Technical Guidance Document B of the Building Control Regulations 1991-2000.
Reason: *In the interests of fire safety.*

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39 Fire and gas detection equipment complete with alarm systems shall be installed throughout the terminal and buildings to provide early warning of hazardous or potentially hazardous situations. The systems shall be installed in accordance with current best standards.
Reason: *In the interests of fire safety.*

40. Suitable Fire Fighting and Suppression Systems shall be installed appropriate to the various risks within the terminal in accordance with current best standards.
Reason: *In the interests of fire safety.*

41. All installations within the terminal shall be designed and installed to current acceptable standards and to be certified accordingly. Certification shall be made available for inspection by the Fire Authority upon request.
Reason: *In the interests of fire safety.*

42. A minimum of 6 hours water supply shall be provided on the site of the Terminal for fire fighting and cooling purposes in accordance with the requirements of the Fire Authority.
Reason: *In the interests of fire safety.*

43. The on site Emergency Plan and the Fire Safety Certificate Application will address the issue of forest proximity to the control building and plant. Active monitoring and active fire precautions shall be implemented as required.
Reason: *In the interests of fire safety.*

44. Management of the Terminal shall liase with the Fire Authority in the preparation of on-site emergency plans and general safety provisions.
Reason: *In the interests of fire safety.*

45. Prior to commissioning of the Terminal, management of the Terminal shall confirm in writing that all of the Fire Authority's requirements have been fully implemented.
Reason: *In the interests of fire safety.*

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FINANCIAL

46. The developer shall pay an initial sum of €4,325,125 to Mayo County Council as a Special Development Contribution towards the expenditure that is proposed to be incurred by Mayo County Council in respect of road improvement works in the area facilitating the proposed development. The particular works to be carried out are;
(i) Widening and Strengthening of the Local Roads L-1204 and L-12044 along their entire length. *Estimated cost €3,500,125*
(ii) Strengthening of Regional Road R313 Bangor-Muinhin and Glencastle. *Estimated cost €675,000*
(iii) The provision of a right turning lane at the junction of Regional Road R313 and Local Road L-12044 in accordance with Mayo County Council Drawing No. 3225/04/04. *Estimated cost €150,000.*
Reason: *To help defray the cost of road improvement works in the area which will facilitate the proposed development.*

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47. The developer shall pay the sum of €1,394,361 as a Special Development Contribution towards the cost of upgrading the proposed extension of the Erris Regional Water Supply to facilitate the development.
Reason: *To help defray the cost of providing a public water supply to the development*

48. The developer shall pay to Mayo County Council a sum of €30,000 as a Special Development Contribution towards specialist infrastructure required by Mayo County Fire Service with respect to the development.
Reason: *In the interests of fire safety.*

49. The developer shall provide artwork to a maximum value of €64,000 in a location and form to be agreed with Mayo County Council.
Reason: *In the interests of visual amenity.*

Aviation Safety.

50. Prior to the commencement of development the developer shall submit confirmation, in writing that the Irish Aviation Authority is satisfied that the development will not interfere with the radar, communications or navigation systems at Dooncarton radar station.
Reason: *In the interest of public safety and to ensure the development does not interfere with air navigation safety.*

MONITORING

51. The Developer shall maintain a record of all complaints made in writing relating to any aspect of the construction stage of the project. Each such record shall give details of the following
(i) Date and time of the complaint
(ii) The name of the complainant
(iii) Details of the nature of the complaint
(iv) Actions taken on foot of the complaint and results of such actions
(v) The response made to each complainant
Reason: *In the interest of proper planning and sustainable development of the area.*

Environment

52. The Project Monitoring Committee group shall meet at least monthly during the earthworks stage and as appropriate during the construction stage of the development to monitor progress. Any member of the monitoring group may request the Chairman of the Project Monitoring Committee to convene an urgent meeting at any time if they consider environmental damage has occurred or is likely to occur.
Reason: *To ensure adequate protection of the environment during construction*

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53. Mayo County Council may, at the request of the Project Monitoring Committee and by notification in writing, require the developer to provide additional environmental controls where necessary to prevent environmental damage.
Reason: *To ensure adequate protection of the environment during construction.*

54. Mayo County Council may require the developer to cease certain activities during the construction stage if it is established that the activities are giving rise to environmental pollution.
Reason: *To ensure adequate protection of the environment during construction.*

55. Prior to the commencement of development the developer shall submit an accredited Environmental Management System (EMS), specific to the construction stage of the development including all subcontractors, to Mayo County Council for agreement in writing. The Environmental Management System shall contain as a minimum:
(i) A Schedule of environmental objectives and targets.
(ii) An Environmental Management Programme.
(iii) Corrective Action Procedures.
(iv) Awareness and Training Programme.
(v) A Management Structure.
(vi) A Communications Programme.

and shall contain a requirement for continuous improvement to the satisfaction of Mayo County Council
Reason: *To ensure adequate protection of the environment during construction.*

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56. The developer shall implement the agreed Environmental Management System for the duration of the construction stage of the project.
Reason: *To ensure adequate protection of the environment during construction.*

57. The developer shall, during the construction stage and/or at the written request of Mayo County Council.
(i) amend the structure and makeup of the Environmental Management System,
(ii) submit a report on any environmental matter,
(iii) submit an environmental audit
Reason: *To ensure adequate protection of the environment during construction.*

58. Prior to commencement of development the developer shall submit a monitoring plan for surface water, ground water, dust and continuous noise. Such monitoring shall be carried out by the developer throughout the construction phase of the project and the monitoring regime shall be agreed with Mayo County Council. The monitoring plan shall, as a minimum, include:
(i) A list of monitoring locations.
(ii) The equipment to be used.
(iii) The identity and qualifications of those carrying out the monitoring.
(iv) The parameters to be used.

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(v) Monitoring intervals.
(vi) Averaging times.
(vii) A proposal on how data observed is to be presented.
(viii) The codes of practice to be used.
(ix) The completion date of all monitoring up to the date of commissioning
Reason: *To ensure adequate protection of the environment during construction*

59. The developer shall permit Mayo County Council access to the site to carry out environmental monitoring checks on surface water (including the silt traps and settlement ponds), ground water, dust and noise as required or as specified by the Project Monitoring Committee.
Reason: *To ensure adequate protection of the environment during construction.*

60. Prior to the commencement of development the developer shall submit a monitoring plan for the settlement ponds and discharges from the settlement ponds, to Mayo County Council for approval in writing. The parameters to be monitored shall be:
(i) temperature
(ii) turbidity
(iii) dissolved oxygen
(iv) electrical conductivity
(v) phosphate
(vi) nitrate
(vii) suspended solids
and any additional parameter required by the North West Regional Fisheries Board.
Reason: *To ensure adequate protection of the environment during construction*

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61. A data management system shall be implemented by the developer to collect and process data during the course of the construction stage. The system shall consist of a computerised database to allow ease of access and interpretation of all monitoring data collected. Final details shall be submitted to Mayo County Council for agreement prior to commencement of development.
Reason: *To facilitate ease of interpretation of all monitoring data collected and recorded.*

62. The developer shall appoint a suitably qualified and experienced Environmental Officer during the construction stage of the project. The Environmental Officer shall contact the Chairperson of the Project Monitoring Committee in the event of
(i) any malfunction of any environmental system
(ii) any occurrence with the potential for environmental pollution
(iii) any emergency

and in addition to the Chairman, in the case of any malfunction, accident or other occurrence which could give rise to pollution of waters, shall contact a designated officer of the North West Regional Fisheries Board.
Reason: *To ensure proper environmental control during construction.*

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63. The developer shall maintain a record of any occurrence specified in Condition No. 62 the record shall be made available to Mayo County Council at any time.
Reason: *To ensure proper environmental control during construction.*

Traffic.

64. The developer shall keep a record of all traffic movements into/out of the site and shall make the record available for inspection to the Project Monitoring Committee at any time and Mayo County Council during normal working hours.
Reason: *In the interests of proper and efficient traffic management.*

65. The Developer shall maintain a written record of all wastes leaving the site. Each record shall give details of the following
(i) The name of the carrier
(ii) The Waste Permit number
(iii) Name of the waste collector
(iv) Description of the waste
Reason: *In the interest of proper planning and development of the area.*

66. The developer shall reimburse Mayo County Council for all costs incurred in the carrying out of any monitoring, monitoring checks, inspections and environmental audits carried out by or for Mayo County Council in connection with the proposed development either inside or outside the site
Reason: *To help defray the cost of Mayo County Council in providing an independent monitoring service.*

67. The developer shall pay the sum of €80,000 p.a. to Mayo County Council for the employment of environmental personnel to monitor the implementation of the Environmental Management System subject of Condition No.56 and shall provide office accommodation and telecommunications on site for this position for the duration of the proposed construction period.
Reason: *To help defray the cost of Mayo County Council in providing an independent monitoring service.*

68. The developer shall pay the sum of €120,000 p.a. to Mayo County Council for the employment of transportation personnel to monitor the implementation of the Transportation Plan submitted on the 11th March 2004 and shall provide office accommodation and telecommunications on site for this position for the duration of the proposed construction period.
Reason: *To help defray the cost of Mayo County Council in providing an independent monitoring service.*

Landscape.

69. Prior to the commencement of development the developer shall submit to Mayo County Council for approval in writing, a monitoring plan to ensure that the detailed implementation of the proposed 5-year maintenance plan for the landscape and planting strategy is carried out.
Reason: *To ensure proper implementation of the landscape strategy*

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Natural Heritage.

70. Prior to the commencement of development the developer shall submit to Mayo County Council for approval in writing, a monitoring plan to ensure that all mitigation measures proposed in the Environmental Impact Statement submitted on 23rd December 2003 relating to the protection of habitats, flora and fauna during the construction and operation phase are carried out. The monitoring shall be carried out by a suitably qualified ecologist, and the scale and level of detail of the monitoring shall be agreed with Mayo County Council, the Heritage and Planning Division of the Department of the Environment, Heritage and Local Government, and the North West Regional Fisheries Board prior to the submission of the monitoring plan.
Reason: *To ensure proper ecological monitoring is carried out.*

Archaeology

71. The developer shall, at its own expense, employ a suitably qualified archaeologist with relevant experience in Peatland Archaeology to carry out, under licence, monitoring of all groundworks (including enabling works and peat excavation) associated with the development at Bellagelly South, Bellanaboy Bridge, Co. Mayo and associated peat deposition site at Srahmore and Attavally, Bangor-Erris, Co. Mayo. No groundworks shall take place in the absence of the archaeologist.
Reason: *To ensure proper archaeological monitoring is carried out.*

72. In the event of archaeological material being found during the course of monitoring, work shall be suspended in the affected area pending a decision by the Heritage and Planning Division of the Department of the Environment, Heritage and Local Government on how to deal with the archaeology. The developer shall be prepared to be advised by the Heritage and Planning Division of the Department of the Environment, Heritage and Local Government with regard to any necessary mitigating action (e.g. preservation *in situ*, or excavation) and should facilitate the archaeologist in recording any material found.
Reason: *To ensure adequate protection of any archaeological material that may exist on site.*

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73. The developer shall submit to Mayo County Council and the Heritage and Planning Division of the Department of the Environment, Heritage and Local Government, in writing, a report describing the results of the monitoring.
Reason: *To ensure proper archaeological records are kept.*

74. The decommissioning of the development shall be carried out generally in accordance with the plans and particulars in the Environmental Impact Statement submitted on 23rd December 2003 and a final detailed reinstatement programme shall be submitted to and agreed in writing with Mayo County Council. All decommissioned structures shall be removed within six months of decommissioning.
Reason: *To ensure the satisfactory reinstatement of the site.*

75. Prior to the commencement of development, the developer shall lodge with Mayo County Council a cash deposit, a bond from an insurance company, or other security to secure the satisfactory reinstatement of the site, upon the cessation of the project, coupled with an agreement empowering Mayo County Council to apply such security

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or part thereof to the satisfactory reinstatement of the site. The form and amount of the security shall be as agreed between Mayo County Council and the developer or, in default of agreement, shall be determined by An Bord Pleanala.

Reason: *To ensure the satisfactory reinstatement of the site.*

END OF SCHEDULE 2

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COMHAIRLE CHONTAE MHAIGH EO

MAYO COUNTY COUNCIL

MEMO

To: Mr John Condon, County Secretary

From: Mr Joe Moran, S.S.O. Planning

Date: 30th April, 2004

File No: P03/3343

Please arrange to have the attached notice published in:

The Irish Independent on Tuesday, 4th May, 2004. Wed.

Mayo News on Wednesday 5th May 2004. Wed.

Connaught Telegraph on Wednesday 5th May 2004. Wed.

Western People on Wednesday 5th May 2004. Too late. — following week!

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Joe Moran
Planning

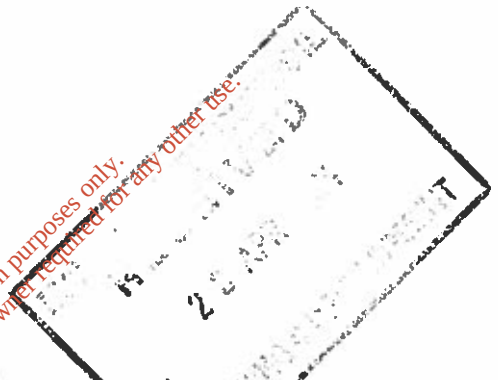
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OUR REF: 04-025-040428-01L
YOUR REF:

28th April 2004

Brian Coyle
Block 1, 2nd floor,
GFSC,
Moneenageisha Road,
Galway.

Iain Douglas
Planning Department,
Mayo County Council,
The Mall,
Castlebar,
Co. Mayo.



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Dear Iain,

I have received your letter (Mayo County Council) dated the 27th April 2004. The content of your letter does not address my request as stated in my letter dated 20th April 2004. I attach a copy of my letter that you have already received for your information. My concerns are in relation to the examination and assessment of safety issues. Access to rightful information pertaining to the safety of my family and members of the public has now become time consuming, frustrating and difficult with little time for observation and/or assessment.

I request an appropriate written response to my letter dated 20th April 2004, ref 04-025-040420-01L, mainly indicating why the Health and Safety Report has achieved the status its got.

Yours Sincerely,

Brian Coyle

Brian Coyle BE, CEng, MIEI, MIStructE
Chartered Engineer

Encl.
B. Coyle Letter 04-025-040420-01L 20th April 2004
Mayo County Council Response dated 27th April 2004

SCANNED

EIA Report 08-07-2014 23:49:32

COMHAIRLE CHONTAE MHAIGH EO

Aras an Chontae, Caislean a 'Bharraigh, Contae Mhaigh Eo.
Teileafóin (094) 24444 Fax (094) 23937

Your Ref. Our Ref.

27th April, 2004

COYLE KENNEDY
28 APR 2004
CONSULTING ENGINEERS

Mr. Brian Coyle,
Chartered Engineer,
Block 1, 2nd Floor,
GFSC,
Moneenageisha Road,
Galway.

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Dear Mr. Coyle,

This letter is to confirm our telephone conversation as requeseld in your letter dated 20th April. 2004. Full consideration will be given the concerns you have expressed

Yours sincerely,

Iain Douglas,
Senior Planner.

SCANNED

COYLE KENNEDY LTD Fax:353-91-753000 28 Apr 2004 15:24
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Our Ref: 04-025-040420-01L

20th April 2004

Brian Coyle
Block 1, 2nd Floor
GFSC
Moneenageisha Rd
Galway

MAYO COUNTY COUNCIL
RECEIVED
28 APR 2004
PLANNING & DEVELOPMENT

Planning Department
Mayo County Council
The Mall
Castlebar
Co. Mayo.

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Re: Request for the HSA Report for the proposed Gas Terminal.
Planning Reference Number 03/3343

To Whom It May Concern / Mr. Ian Douglas

This is to notify Mayo County Council that on the morning of the 20th of April 2004, I made a verbal request (by telephone) to Mr. Ian Douglas to view or obtain a copy of the submission/observation documentation prepared by the Health and Safety Authority (National Authority for Occupational Safety and Health) in relation to the proposed Gas Terminal Development referenced under planning number P03 / 3343

During our telephone conversation, Mr. Ian Douglas informed me that this document is not currently available as it is regarded as an internal document and will be available after Mayo County Council has made their decision.

The consequence of this is that the public are unable to view or obtain a copy of this document and therefore their concerns and observations in relation to the HSA submission will not be considered prior to a decision being made by Mayo County Council. Concerned members of the public have also informed me that they have requested a copy of this document but with no avail.

I therefore request Mayo County Council to confirm to me in writing why this document has this status and is not currently available to the public. Any information submitted by the National Authority for Occupational Safety and Health in relation to this development is certainly of public interest and should be made available as soon as possible giving sufficient time for public verification and examination prior to a decision being made by Mayo County Council.

Yours Sincerely,

Brian Coyle BE, CEng, MIEI, MIStructE
Chartered Engineer

SCANNED

COYLE KENNEDY LTD Fax:353-91-755000 28 Apr 2004 15:24 P.02
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TOM PHILLIPS + ASSOCIATES
TOWN PLANNING CONSULTANTS

8 - 11 Lower Baggot Street, Dublin 2, Ireland
Tel +353 1 478 6055 Fax +353 1 478 6054 info@tpa.ie www.tpa.ie

Principal Administrative Officer
Planning Department
Mayo County Council
Áras An Chontae
Castlebar
County Mayo

Monday, 15 March 2004

Dear Sir or Madam:

Re: Planning Application by Shell E&P Ireland Limited for the Development of a Gas Terminal at Bellagelly South, Bellanaboy Bridge, Co. Mayo, and associated peat deposition site at Srahmore and Attavally, Bangor-Erris, Co. Mayo

Reg Ref: P03/3343

Please find attached a copy of the newspaper notice published on page 30 of the Irish Independent on Friday, 12 March 2004 in accordance with article 35(1)(C) of the *Planning and Development Regulations, 2001*, to advertise that significant additional information has been submitted.

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Yours sincerely,

Gavin Lawlor
Associate
Tom Phillips and Associates

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Toyota Corolla 2000 excellent cond. e/w c/l 5dr hatchback €7750 Ph: 0872567822 / 014501533

CARINA E 1.6 SLI, 1997MO, silver, 97k mls. Excellent cond. Spoiler, NCT 01/06. €4,200. 087 8217366 (Dublin)

CARINA 1997, 1.6i Executive, saloon, 96K mls, NCT 06, excellent condition, many extras. €3,300 ono. 087 2535587

CELICA — 02D, new price €43,500, black, leather seats, s/r, a/c, Immac. cond. Sell €28,000. Tel. 087 8325891.

COROLLA H/B 1998, Black, quick sale, €5,650 ono. Tel. 466 2138 or 087 9213909

TOYOTA COROLLA: 1.4L Estate, 2000, p/steering, c/locking, e/w, twin air bag, red, mint cond. €6,950. Tel: 086-8121946

TOYOTA RAV 4 '95 5 dr, LWB, NCT '05, e/w, s/roof, a/c, serv. regularly. €6,000 Swords area. Phone: 086-9462851.

'01 TOYOTA CAMRY 2.2L, 50,000 miles, one owner. Phone 043 25140.

VAUXHALL

VW Golf GTI 1.8 Turbo 2002, blue, 5 dr, FSH, 39k mls, recent service €19950 (trade in considered). Ph: 0872569674 (Naas)

VOLKSWAGEN

VW PASSAT DSL '94,NCT 0605, tax 0504, 166k mls, vgc, serviced regularly, 2 careful owners, €1,950 ono.Galway. 0879862641

VW Golf 1.9 Dsl Manual, wine, 135k mls, 5dr, good cond, CD, alloys, NCT 02/05, €3,100 Wexford 0879178976

'00 VW 1.6L 5dr, 36k mls, spotle one lady owner, Surf blue, like new, €7,500 Tel: 087-2537455

VW PASSAT 1999 1.8 1 owner, silver, extras 4165717

'02 VW Passat TDI 100bhp comfortline 31kmls VW warranty & assis to end May, fsh, inky blue, mint cond €21500 051601307 or 0567728985 eves Kilkenny

VW Golf Black Met, 3 door, 44k mls. Comfort Line, GTI alloys, cd, lady driver €12,000. 0866087113

VW POLO '98 1.0l., 5 dr., 45k mls., €5,800 o.n.o. Call after 6pm. 0879189398

VW Golf '99 Comfortline, s/r, arm rest, sport alloy wheels, alm, €12,000 ono 0877750964

GOLF Convertible, 00D, black, 17k, alloys, e/w, fsh, lady owner. €18,500. 086 8385999

GOLF 01, 1.4 Comfortline. Exc cond, 1 owner, 30k mls. Navy. €14,000 ono. 087 9060392.

GOLF 02D, 1.4, Comfort. Silver. 15k mls. S/r, alloys. 1 owner, immac. €16,500. 087 2551605 / 01 295 7659.

GOLF '03D, 1.4 Comfort line. 3 door. Silver. 9K miles. Elect, alarm, c/l. 1 lady owner. €17,150 Tel. 087 9893001

GOLF 1.4, comfortline, '01. 6CD changer, alloys. Met. silver. 45,000 mls. Mint condt. €13,300. 086 [illegible]7 3490.

GOLF 1.9 TDI, '02, silver Comfortline, 1 owner. Taxed 06/04. 31[illegible] Excellent condition. €18,000 ono. Ph. 087-9137707

GOLF 99, 5 dr, Comfortline, 1.6, 19k mls, blue, s/r, NCTd, all elec, 1 owner, €10,750. Very clean. 086 8274414

02 VW GOLF Comfortline, 14,000 mls., f.s.h., 1 lady owner, alloys, e/w, excellent condt. €18,500. Tel: 086 8077252

POLO, '03, maroon metallic, 3.7k mls. 5 dr., alarm, CD. Immaculate. €13,600. 087 293 7106 after 6pm.

VW GOLF Comfortline '01D — 3 door 13K miles, CD, alloys, alarm, f.vw.s.h. met. green, as new. €13,700. 086-3274032

V.W. GOLF 1.4, 1998, 2 owners, 69K mls., Immaculate, dark green, c/l, €4,750. Tel. 2843528, 087 9380649.

VW GOLF 1998, 5 door, 1.4, 43K mls, navy metallic, remote C/L, alarm, CD, €9,500 o.n.o. Ph 086 8040043

V.W. POLO '96, wine, 80,000 mls, driving well, lady owner, good condition. NCT to 04/05. €2,800 ono. 086 8360329

★ VW VENTO diesel, 95, NCT 03/05, €2,400 ono. 087 254 0171

VW Bora TDI SE. Late 00 NCT '06 57k mls high spec a/c 1th s/w auto mirror/wipers, silver. Immac cond, taxed €13000 Dublin Tel: 0863692992

00 GOLF 1.4 silver, 40K, comfort line, alarm, alloys, NCT 2 years, FSH, pristine condition. €11,600. PH 087 222 8400 (Galway)

Double back doors, 23k mls, roof rack, bullbar and tow hitch, Munster area Tel: 087 8395548

MITSUBISHI Canter Lorry 2001. Beautiful lorry, 1 owner from new, owner emigrating, €18,500 ono. Cork 086-2520842 or 086-3585649

AA ENGS G/Boxes. Diffs McArdle 042 9663939 / 086 2592575

FORD TRANSIT MINIBUS, 02, high roof, 15 seats, factory built, red, only 34,000 mls. 1 owner from new. €24,500 o.n.o. Tel: 087 2531121

MERC SPRINTER 312, '98 panel van, d.o.e. test. 042/9746127

MINIBUS Ford Transit, '97, 15 seats. 042/9746127

MITSUBISHI PAJERO SPORT Commercial, 01, DOE tested, c/l, e/w, e/m, alarm, lwb. Ph: 087 2969435

REFRIDGERATED HIACE 00 LWB panel van. 042-9746127.

SCANIA 144 460. '00 Reg with permanent work. Good opportunity for ambitious hard working owner driver. Tel. 087 2441574

TOYOTA DYNA pick-up, '99, very clean, d.o.e. test. 042/9746127

TOYOTA HIACE '94, l.w.b. panel van, d.o.e. test. 042/9746127

VOLVO PLAXTON 53 seater Coach, 92. Tel: 071-9641059

WANTED 42 or 44 ft Artic cattle trailer. Ph; 087 2587288

'98 MAN 15.224 26 ft. double sleeper, silent wide cab, not to be missed. PH 086 829 8281

COMMERCIALS WANTED

FORK LIFT wanted, 3 to 4 ton. Solid wheels. Phone 4503462.

FOUR WHEEL DRIVE

SUZUKI Vitara '94, special edition, €4,950. Ph: 086 8150268

TOYOTA LANDCRUSIER l.w.b. commercial, '00, 50,000 mls, blue, mint condition. Tel: 087-2902628.

'98 GRAND CHEROKEE JEEP LTD 4.0L, auto ,59k mls, black, full leather, exc. cond. €23,500. Phone 086 8583317.

FUNERAL VEHICLES

HEARSES EX STOCK SLIGO: Mercedes 2003 demo 3K €74,995. 1998 €49,995. 1995 €24,995. Fords 87 to 96 Irish Funeral Vehicles Sligo, 071 9154000

1990 FORD HEARSE 70K miles. Built by Deffys. Immac Cond. Tel: 086 8432 783

1993 FORD SCORPIO Hearse 2.9l, auto, Fergus Quinn built, NCT '05, Tel: 087 2535519

MACHINERY FOR SALE

FORKLIFTS & Rough Terrain Forklifts for sale. Tel. 087 2595993 between 10 & 4 p.m.

JCB PARTS Nationwide Service Derek Steele, ECI 01-500 8701

MOTOR CYCLES

SUZUKI BURGMAN '02 400cc ,Silver ,8k Mls. Beautiful cond.Alloys, When new €8,000, now €3,950. Rolls Royce of scooters .Ph: 0872896888

YAMAHA R6 01, Ex Richard Brittons bike, engine rebuild, kit ign., Ohlins suspension, 120.3 bhp, €5,500, Ph: 0879314031

MOTOR HOMES

Esteral Caravan Mint cond, very little used, awning, plus extras, best offer Tel: 01 8310446

TAXI/HACKNEY

MERC VITO 108D, '98, wheelchair acc. 8 seats. 042/9746127

TAXI PLATE, METER & SIGN for sale. Ph: 087-2505845.

LEOPARDSTOWN. 2 single rooms to rent. €350pm. + bills, all mod cons. Ph: 087 7687465 or 204 5055

LUCAN Couple to share 4 bed house with other couple, exclusive use of 2 bedroom + bathroom, modern f.f. adj to bus route. €550 pm. Tel: 086-3802949 (eves)

★ MALAHIDE: 3 rooms avail, 1 Single & 1 double, 1 en suite for n/s. Ph 087 2406496

MONKSTOWN/SEAPOINT — Double room in large beautiful flat. Sea views. €535 p.m. + dep. 280 3305/085 720 8858.

NAVAN ROAD 2½ mls. city centre — single room avail. Sharing house with 2 other people, all mod. cons., n/s, €95pw incl. bills. Ph: 8682175.

OFF COLLINS AVE. Single rooms to let, newly refurbished house. Phone 086 8068805

RATHFARNHAM, Grange Rd. Room in lux house, bright/spac living room & kitchen, all mod cons. €370pm. 087 258 5908.

RATHFARNHAM, single room, sharing 3 bed. house. with 3 others. €295 per mth. Ph. 086 3895575

S.C.R. Adj. St. James's Hospital. Large room in modernised house. €100p.w. no bills. Ph. 086 8190834.

SWORDS, 1 Prof req'd, double room in 3 bed house. All mod cons, close to shops, gym, bus, Airport. 087-2421717 after 6pm.

ACCOMMODATION STUDENT

HOST FAMILIES required Dublin 1, 7, 9, 11. Dorset College, Tel: 8309877

BUSINESS TO LET

BAR/Restaurant for lease tourist area Co. Clare. 087 9303755

KILKENNY AREA Take-Away to let, fully equipped. Tel: 086 8546483.

RESTAURANT IN Carlow Town. Further info. 087-6441022.

HOUSES FOR SALE

CITYWEST, THE BELFRY. Think the best in style and design and you'll conjure up a picture of the superior properties at The Belfry. 'Fabulous' new 4 Bed Detached with lots of luxurious extras included as standard. Great value from only €375,000. Sherry FitzGerald New Homes 4571888.

CLONDALKIN Monastery Park: Large extended end 4 bed semi det. dormer bungalow on c. ¼ acre. Kit., 3 rec., 2 baths, exc. potential. Excess €500,000. Propertyteam Kilgallon; 4571811

HOUSES TO LET

CASTLEKNOCK (Fernleigh) 3 bed f/f, all mod cons, immaculate condition. Ph; 087 9649616

CLONEE AREA 4 bed s/d. Suit family/profs. Fully furnished, all mod cons. Pristine cond. Tel. 087 9790346

CLONSKEAGH 4 Bedroom House, all mod cons. Avail. immediately. Suit profs. €1650p Phone: 086 3822040

PHIBSBORO Townhouse, excellent condition, f/f, 2 bedrooms, study, s.f. patio garden. €1000 pm. Ph; 087 7468786

TALLAGHT, D24 Belgard Green, 3 bed s/d, f/f, newly decorated, profs. only. €1200pm. Ph. 086 2306670

TALLAGHT Kilnamanagh, 4 bed. semi, recently refurbished with conservatory, all mod cons. €1,300 p.m. 087 2541948

TALLAGHT, Springfield: 3 bed. f/f, all mod cons, off st. parking. OFCH. Accept rent allowance. Ref ess. €1200pm. 086 8036709

TYRRELLSTOWN D15, s/d 5 bed hse. All mod cons. FF. garage. Avail. ASAP. Reasonable rent. Tel: 087 2225338.

WALKINSTOWN, D.12. Spacious 2 bed and tce house with garage, all mod cons. €1,050 p.m. Ph: 086-0640060.

HOUSES WANTED

PRIVATE INVESTOR will buy income properties, look at all, any condition, CAN PAY CASH. Tel: 085 7223035.

SUTTON/HOWTH AREA — Bungalow/site wanted to buy. Contact 086 2716771.

PREMISES FOR SALE

BAGGOT ST (off), commercial premises, c.1,500 sq ft. Car parking. Superb location. Ref. Pat Hickey Auctioneering Ltd 8309055

Fingal County Council

Comhairle Contae Fhine Gall

Fingal County Council, invite Tenders for two separate contracts for the construction of Leixlip/Ballycooten Water Supply Scheme Phase1. The two competitions are as follows :-

(1) Contract No.1 - Civil Works Contract - (New Reservoir , Water Tower and Buildings)

(2) Contract No. 2 – Mechanical and Electrical Installation – (New Reservoir, Water Tower and Buildings)

Further details and information may be obtained from the Supplement to the Official Journal of the European Communities (OJEC) at http://ted.publications.eu.int or by visiting www.etenders.gov.ie

Mayo County Council - Further Information. Shell E&P Ireland Limited have submitted Further Information in relation to their existing Planning application, Register Reference P03/3343 - An Application for development at a site of 160 ha, approximately, in the townland of Bellagelly South, Bellanaboy Bridge, County Mayo, and a site of 117 ha, approximately, in the townlands of Srahmore and Attavally, Bangor-Erris, County Mayo, for the development of a gas terminal for the reception and separation of gas from the Corrib Gas Field, and for a peat deposition site, respectively.

Significant further information in relation to the application has been furnished to Mayo County Council, and is available for inspection or purchase at a fee not exceeding the reasonable cost of making a copy, at the offices of Mayo County Council, Aras an Chontae, The Mall, Castlebar, County Mayo, during office hours from 9.00 a.m. to 1.00 p.m. and 2.00 p.m. to 5.00 p.m. (Monday - Friday). A submission or observation in relation to the further information may be made in writing on payment of €20, to Mayo County Council's Planning Department, within a period of three weeks from the date of this newspaper notice.

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3 sheets and App. 04

Hi Mo...,

I phoned yesterday afternoon to clarify that the letter sent out by you on 16th March was not entitled Roster by HCC until 18th March and was received by us on 22nd March. We had 11 days to make a submission.

Will you get a receipt for this?

Thanks.

MAYO COUNTY COUNCIL
RECEIVED
- 2 APR 2004
PLANNING & DEVELOPMENT

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PLANNING DEPARTMENT
MAYO COUNTY COUNCIL
ARAS AN CHONTAE
CASTLEBAR
CO. MAYO
094-24444

30-01-2004 13:40:48

Receipt No : PLANNING/1

EDWARD & IMELDA MORAN
CHAPEL STREET
BELMULLET
CO. MAYO

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TEL
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Issued By : Orla Burke
GM: PLANNING SECTION

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SUBMISSION

Re: **P03/3343 - Further information requested**

Item 1, Vol. 1. – Traffic Management Plan

Minister's Consent

The first thing to note about the Transport Management Plan is that it was specifically required as one of the conditions of consent by the Minister of the Marine in his communication[1] of 15th April, 2002. It is consequently extraordinary that it had to be requested as further information as recently as 17th Feb. 2004 by the Planning Authority. It should have been included in the EIS. The fact that it wasn't adds to Shell's credibility gap, which dates back to the arrogantly inadequate responses made to An Bord Pleanala's request for further information, previously.

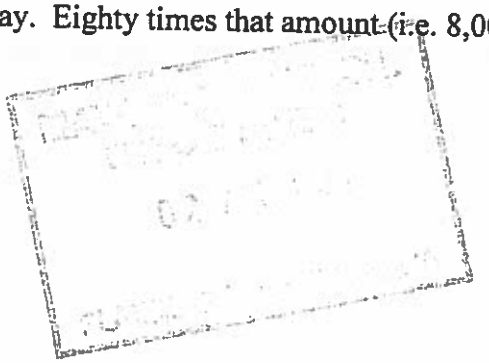
5.5 metre road width

However to deal with the present, what the Transport Management Plan envisages is so incredible that it defies ordinary commonsense and simple arithmetic in a most extraordinary way. For instance the revamped haul route will have an average width of 5.5 metres, and will include at least four 'single-lane-only' bottlenecks, yet we are asked to believe that up to 800, 2.5 metre-wide truck trips per day (averaging 80 per hour) can be expected to travel in opposite directions at up to 40 miles per hour on this 5.5m route while maintaining a very tight schedule on absolutely depends on free-flowing conditions for viability.

which

6" traffic clearance

Taken in more detail, it means that trucks will be passing one another at a rate of once every 90 seconds with a space of only 0.5m total clearance. This in turn allows only 0.16m (6") clearance at the road margins on either side and 0.16m (6") between the vehicles themselves. However, the full picture is even more implausible in that the margins are admittedly very prone to subsidence so that a 6" (0.16m) clearance cannot be considered safe even for ordinary rates of HGV traffic, say 10 per day. Eighty times that amount (i.e. 8,000%) places it beyond all belief.



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Independent Expert Evaluation

Shell is effectively presenting 'desk-studies' as workable solutions when, in fact, they fail to stand up to even preliminary scrutiny. It is outrageous, consequently, that these proposals are not being subjected to independent expert evaluation such as the ERM Report, DNV Report, Posford Haskoning Report and Peer Review Group Report which were commissioned in respect of the previous application. Those reports provided a credible basis for identifying and addressing vital issues. The Planning Authority failed to commission such expert evaluation last time around and drew severe criticism as a result. Yet it is repeating this failure again despite several requests, oral and written, to do so.

Extreme Liberties

What seems likely in the event of this impractical scheme being approved is that once permission is achieved, extreme liberties will be taken with the conditions set. It will be forced through by hook-or-by-crook - like a battle field operation with little regard for consequences. Who can honestly envisage up to 800 trucks a day passing each other in opposite directions at up to 40 mph at 90 second intervals with no more than 6" clearance between the trucks themselves and between trucks and road margins? There will be extraordinary pressure on Shell E & P Ireland Ltd from Shell Ltd. to meet deadlines. E & P stands for Exploration and Development which represents the darker side of Shell, as the Ogoni people in Nigeria, and others world-wide have good reason to know. The international head office creates the pressure, local management must deliver – weather etc. is irrelevant.

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Bottlenecks

Going further into the matter, consider what might happen in practice at each of the recognised bottlenecks and, especially, at the crossing of the main Belmullet to Ballina/Castlebar Road (R313) Consider the R313 where up to 80 trucks must cross every hour. This means a truck every 45 seconds. Unless they queue into groups of 5, or so, there is no way in which they can be accommodated. However such queuing is not possible as the various stages of unloading, wheel-washing recording etc. would be over-loaded by such crowding. Worse still, the crossings of the R313 are to be staggered so that the returning trucks cross in two stages, first into the west-bound lane and then, 1km on, they must cross the east-bound lane. This results in *non-Shell* traffic on the R313 being subjected to unmanageable levels of interruptions - one every 45 seconds and further complicated by involving two separate junctions 1km apart. As non-Shell traffic on that stretch runs at up to

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·2,000 per day (i.e. up to 200 per hour - 1 every 20 or so seconds) the schedule set by Shell of 400, 45-52 minute round trips cannot be remotely realistic.

Grid-lock

This is still only the tip of the iceberg. Each of the acknowledged single-lane bottlenecks would add to the potential grid-lock, especially those where the bottleneck is compounded by an extended curve and consequent poor vision. Equally, the impact on queues at loading, weighing, recording, wheel-wash and unloading apron, as well as egress from deposition site back into the traffic-flow on the public roads, is literally inestimable. Yet the Response does little more than gloss over such real and potentially insurmountable obstacles.

Credibility Gap

The credibility gap is unbridgeable. The attitude of Shell is clearly as arrogant as previously, being dismissive of the consequences for the public overall. This was evident at the re-convened Oral Hearing in that the constraints set by Shell in commissioning their plans invariably turned out to be the root cause of the fundamental defects, which only became apparent as the Hearing unfolded. 'Time constraints' and 'cost constraints' were the main culprits, as indeed they are in the current proposed Transport Management Plan. Setting a schedule for 400 round-trips per day, for example, is so tight and inflexible that it shows little comprehension of the consequences of the multiple clogging-points en route. In this regard, the target of 120 working days to transport the waste peat appears to have forced all other considerations out of the picture.

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Weather

When the uncertainty of weather is added to the above picture, and it is recalled that work on Srahmore bog has always been seriously hindered by the unpredictability of the weather, all assurances re targets ring hollow. With milled peat Bord na Mona were working at all times with a comparatively dry material which was capable of being stockpiled for many months to enable targets to be met in the event of extended bad weather. In the current instance, Bord na Mona are faced with an essentially slurry-like[2] material, as raw peat is up to 95% water content. Bord na Mona cannot guarantee secure and containable conditions for such slurry-like waste either at the terminal or at the deposition site during inevitable periods of extended rainfall. The implications of such an untried and untested undertaking for traffic management during the projected six months of peat transportation are potentially of chaotic proportions.

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Nothing in the Response addresses the inevitable log-jams and protracted delays inherent in such clearly intractable problems.

Time Constraints

The consequences of unrealistic time constraints imposed on transport schedules apply equally to the route preparation. It is acknowledged in the Response that the proposed haul route roads as they stand are entirely inadequate and that not only re-construction but widening is needed before transportation of peat could commence. However, time constraints prevent much of this work being carried out, particularly in regard to widening. When it is realised that only minimal widening was envisaged in the first instance, the real seriousness of the situation emerges. Anyone living in the Erris area who drives regularly on these 'rural non-national roads' knows how frequently truck drivers unfamiliar with peat-based roads lose control and topple over due to the margins giving way. Likewise, those who walk on such roads when heavy vehicles pass know how jelly-like the wobble under-foot feels. Short-cuts are being taken re route preparation and these immense consequences for all aspects of traffic management are not addressed by the Response.

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Margins

Time constraints likewise preclude the type of work necessary to provide an adequate foundation for the margins of the proposed haul road. The report acknowledges that the type of reinforcing envisaged is so deficient that very substantial subsidence is expected and will be the focus of on-going repair work. At 5.5 metres, road width makes no allowance for safety, and with up to 800 trucks per day passing in opposite directions at 90 second intervals constant use of the margins will be the norm. In such circumstances, it is inevitable that dangerous conditions will frequently prevail and that accidents with potentially life-threatening consequences become not merely a possibility but a probability.

Cost Constraints

Time-constraints are only one of the fundamental, unrealistic impositions. Another which is clearly quite as fundamental and pervasive is cost-constraints. A 6.5 metre wide road, with no bottlenecks and a solid foundation, is the minimum requirement implied by the survey findings as presented in the current 'Response'. A road laid on bog is, in effect, 'floating' on the underlying peat and can never be stable. This is documented in the Response which acknowledges that peat-based roads are subject to surface break-up and to frequent,

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significant and unpredictable subsidence as the level of groundwater fluctuates with changing weather conditions. Every regular road-user in the Erris area knows that an apparently good road can deteriorate into a 'humps-and-hollows' condition in dry weather. Ironically it is the 'good' weather which causes the most dramatic damage.

HGV's

The relatively cheap, quick-fix solution proposed might be adequate for normal traffic as the quoted standard suggests, but this standard is based on traffic use of only 200-1,000 per day over a design-life of 20 years. Heavy Goods Vehicles are assumed to account for 10% of that traffic (i.e. 20-100 HGV's per day). Up-grading this standard, as proposed, to the 1,000-2,000 vehicles per day level (i.e. 100-200HGV's) does not come anywhere near meeting the requirements of the projected six-month long, intensive use by 800 HGV's per day - and this is only Shell traffic. Nor does the use of a geosynthetics layer dispel legitimate fears as there is nothing 'normal' about 800 HGV's per day on top of the "approximately 2,000 vehicles per day (which) have been recorded on this section of road" (R313). From this we can infer that another 200 HGV's must be accommodated bringing the total to 1,000 HGV trips per day on this section of the R313.

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Rural Non-National

Another clear inference is that the standard appropriate to 1,000 HGV trips per day would be that suited to an overall vehicle usage rate of 10,000 vehicles per day (i.e. where HGV's account for 10% of traffic.) Obviously HGV's have a wear and tear effect on roads exponentially greater than light vehicles usage so that it is National Road Standards, not Rural Non-National Road Standards as proposed, which should apply. In like manner the 20 year design life, and the 10 year maintenance life, standards are not appropriate. Deterioration resulting from intensive use is not only not directly proportional to rate of use (i.e. the number of vehicles per day) but is likewise not directly proportional to the length of period of use. Intense usage over a concentrated period of time creates energy build-up effects and resonance related damage of extraordinarily disproportionate levels. On unpaved roads in East Africa I have witnessed this phenomenon very graphically.

Planning Authority

In short, there is no way that a Rural Non-National Road in extremely poor condition can be transformed by superficial re-building into the type of road appropriate to handling National

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Road levels of HGV usage, especially when it is a peat-based Rural Non-National Road. Time-constraints and cost-constraints place consultant/planners in an invidious position and so Planning Authorities must maintain a bottom-line re minimum acceptable standards. If they fail to counterbalance those negative pressures to produce 'quick fix' and 'cost-effective' solutions, then the community must pay the price in terms of upheaval, vastly increased risks and potential tragedy. Reliance on the Observational Method has been thoroughly discredited so ultimate responsibility rests solely on the Planning Authority.

Footnotes: Item 1:

1. see copy of this letter supplied in Shell's Response, Item 2, Vol 1.
2. The exhaustive borehole and auger test results done for the previous application show how rapidly peat changes to a slurry-like consistency beneath the relatively firm top 12" layer.

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Vol.1 Item 2: Structural Stability of Pipelines

Pipeline Pressure

Shell's response to this Item is again both evasive and minimal. The safety implications underlying this issue are potentially the most fundamental and explosive of all the issues raised by the Planning Authority. Yet nothing in Shell's reply acknowledges the dangers inherent in the import pipeline which carries raw gas at extremely high pressure from the gasfield to the terminal. Instead, the Response refers to the import pipeline and the export pipeline as though they were similar in all respects. This is precisely the kind of misleading, simplistic response to fundamental issues which increases the credibility gap concerning Shell's[1] openness and accountability.

Safe Management

There is as much difference between the import and export pipelines as between a raging torrent and a smooth-flowing river. The import pipeline carries raw gas at full gasfield pressure and has all the added complications which impurities, highly flammable additives

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(methanol) and liquid slug build-up create for safe management. The export pipeline, by contrast, carries purified gas at much reduced pressure levels. Both pipelines present major potential safety threats to the populated areas they pass through, but the threat inherent in the import pipeline is of a far greater magnitude. To portray it otherwise, and thus ignore the enormous safety implications, is grossly misleading.

Unique Location

The basis for this contention lies in the fact that there is no other instance world-wide of a pipeline at gasfield pressure carrying raw gas 9km inland (and through populated areas), as confirmed[2] by Mr. David Taylor, consultant, at last year's Oral Hearing. The norm is to de-pressurise raw gas as close to the well-head as possible and to process it off-shore. In the minority of instances where raw gas is brought ashore for processing, it is de-pressurised and refined in the immediate vicinity of the shore (e.g. Ayr, and Bacton in UK). The enormity of what is proposed for Bellanaboy is best highlighted by the fact that there is ***no*** recognised standard for transmission of such high pressure gas applicable to the current context. The ***Andrew Johnson Report***, which is the only expert evaluation of the on-shore section of the import pipeline, conservatively states:

- "The onshore section of the Corrib Gas Pipeline operates under certain conditions which are unusual. (P.3) ...
- It is rare for an onshore pipeline to transport unprocessed well fluid in the vicinity of inhabited buildings. (P.9) ...
- The project design basis for the onshore pipeline states that IS328 will be used as a supplement to BS 8010 where this is considered to be beneficial. (P.9) ... It is not normal practice for sections of one code to be substituted by sections from another. (P.11) ...
- An upper pressure limit is not defined although the code states that in general practice, the maximum pressure ranges up to 100bar.

Nothing in the absolutely innocuous Response to Item 2 alerts one to such fundamental reservations being on record. As stated by Johnson, the highest maximum pressure recognised by industry standards is 100bar whereas the import pipeline is intended to operate at up to 150bar - this is analogous to a speed limit of 100kph (62mph) being exceeded by speeds of up to 150kph (93mph)!

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Written Confirmation

Shell's Response is devoid of detail and can in no way be construed as an adequate reply to the Planning Authority's request for "written confirmation from the relevant regulatory authority that the design of the proposed gas pipeline from the terminal compound to the site boundary is suitable to ensure the structural stability of the pipelines constructed in deep peat soil". The truth of the matter is that the Minister's letter of 15th April 2002 merely outlines the parameters within which the consent is to be granted. Shell makes no attempt to identify any particular item in this letter as constituting "written confirmation…that the design of the proposed gas pipeline…is suitable to ensure structural stability….in deep peat soil" because there is no basis for such a claim in the letter. The question asked by the Planning Authority was quite specific, the response from Shell is so vague as to constitute outright disregard for the Authority and for the Planning legislation underpinning it.

DET NORSKE VERITAS

The Det Norske Veritas Report was prepared in response to "an ABP request that the Health and Safety Authority (HSA) make recommendations to ABP on the acceptability of the proposed development under the Seveso II Directive". This Report indicates how extraordinarily weak are the bases on which absolutely vital aspects of the proposed import pipeline are intended to proceed. It leaves no doubt about the imperative need for a clear and categorical answer by Shell to **Item 2**. It states:

- "A recent analysis of failures in European gas pipelines (Bolt, R) indicates that the major causes of pipe rupture are external interference and ground movement" (3.4) …

The 22 landslides recently in this locality caught the media headlines in a dramatic way but instability of peat is an everyday fact of life which cannot be ignored with impunity. When taken in the context of the pipeline itself being alive with kinetic energy of enormous proportions, the potential dangers become inescapable. The 150bar pressure (1 tonne per square inch) contained within the pipeline can make it behave like a poorly secured high-pressure firehose, only magnified many fold. This phenomenon is specifically identified in the Minister's letter of 15th April 2002[3] in both Conditions 7: "to ensure that any pipeline lateral movement as a result of buckling has not left the pipeline exposed…" and Condition 8: "for mitigating upheaval buckling …". The instability of the peat added to the instability of

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the pipe itself warrants credible assurances. The minimalist and evasive four short paragraphs tendered by Shell are gravely worrying.

- "There are a number of slugcatchers in operation worldwide, but the number of years operation without a failure is insufficient to derive a statistically valid failure frequency." (3.4) …

The whole concept of using a slugcatcher so far from the gasfield, and additionally so far from the shoreline, is highly questionable. The tendency for unmanageable slugs to form increases with distance from the gasfield. A comparison of alternative solutions[4], is legally required under EIS legislation - and ABP specifically requested such a comparison but to no avail. Shell refuses to consider any other option or to be forthright about the one chosen.

- "Table 3.1 Modes of Failure for Piping Systems: Out of a total of 1,014 failures, 303 defective pipe or equipment; 190 operator error; 129 overpressure; 92 Corrosion; 84 unknown; 49 impact; 44 wrong in-line equipment or location; 44 temperature (high or low); 35 external loading; 16 vibration; 17 other and 11 erosion." (3.4)

The information sought in Item 2 obviously had to do with safety yet the very little information supplied side-stepped this fundamental issue. DNV however did not evade the fact that accidents happen - and with far greater frequency than is acknowledged anywhere in Shell's EIS. What is significant in this table is that well over 50% of failures were due to human error or inadequate care.

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- "Leak frequencies have always been a major source of uncertainty in risk analysis of onshore plants. No comprehensive collection of leak frequency experience has yet been published for onshore process equipment. Onshore risk analyses have traditionally used leak frequencies whose origin is obscure, typically dating from the 1970's and which cannot be traced to any actual data from any specific group of plants (e.g. USNRC 1975), but are nevertheless the only available onshore sources."(11.7)
- "Most of the available onshore leak frequencies come from obscure sources, with no information about the origin, quality or analysis of the data. It is even possible that they were judgmental sets of frequencies, not based on any data at all, which have become accepted by virtue of frequent repetition. They have never been corroborated by an onshore data set with defined hole sizes." (11.7)

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These excerpts highlight the extraordinary bullishness which characterises the Exploration and Development side of the industry. It's typified by an attitude towards standards which treats them as obstacles to be overcome and, so long as the risks involved don't threaten Shell's 'costs' and 'deadline' targets, they'll drive ahead. Risks to the community and to the public at large are acceptable it seems – so long as they don't attract dramatic media interest.

Footnotes Item 2:

1. A distinction between **Shell Ltd.** and **Shell E&P Ltd.** is appropriate in that it is invariably **the Exploration & Development** arm of Shell which gives rise to negative criticism worldwide.

2. see **An Bord Pleanala Report**, ***PL16 - 126073*** (p. 76)

3. see footnote 1, Item 1, above

4. [There is in fact a revolutionary new process which uses gasfield pressure to create supersonic gas speeds within a 6ft long tube, thus separating out impurities. It was developed by a Shell subsidary, has passed all commercial testing and is already in use in Nigeria and Indonesia. It has been hailed in Exploration & Development circles as the biggest breakthrough in the past 40 years. Its significance for Corrib is that it would permit off-shore refining of gas on an unmanned rig which in turn would permit gas to be piped ashore without any methanol or other additive. http://www.twisterbv.com/, the website for this technology, is easily accessible and very user-friendly.]

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Conclusion

Due to the time-constraints imposed by Shell/Mayo CC we were deprived of 10 of the 21 days allowed for reading through the very substantial volumes of the Response. Availability of copies and misinformation have thus caused our submission to be curtailed to the two most clearly incongruous Responses.

The common denominator highlighted by us is the arrogant inadequacy of Shell's Response and its disregard for the statutory jurisdiction of the Authority. Ironically, we welcomed Shell's take-over of Enterprise believing the enlightened attitude to stakeholders and the environment, as detailed at length on Shell's website. Experience has changed our expectations to the point of outright scepticism, and media reports in recent months amply reinforce this view. The following excerpt from the ABP Report says it all:

> ***"The Applicant's Response has unquestionably failed to address the further information requested by the Board. It was not a complicated request and in my view it was comprehensible."*** (P.207)

Edward & Imelda Moran
Belmullet & Bunowna

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(1)

SCANNED

MAYO COUNTY COUNCIL
RECEIVED
1 APR 2004
PLANNING & DEVELOPMENT

Mayo County Council,
Planning Office,
The Mall,
Castlebar,
Co. Mayo.

Pn: 7920
EDC 05L
1/4/04

Re: Planning application File No. PO3-334-3 by Shell E & P. Ireland Ltd. being the construction of a natural gas refinery at Ballinaby, the establishment of a deposition site on Galway Bay at Srahmore, & the transport of enormous volumes of waste below the low tide.

Submission: Cornelius King, Aughoose, Pullathomas, Ballina, Co. Mayo.

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In my submission I'll be dealing with the
1° Corrib Terminal: Ballinaby Bridge, Earthworks Report, December 2003.

2° Srahmore Peat Deposition Site, Non-Technical Summary, (E.I.S.)

3° Shells response to Request for further information — item 11.

The excerpts I've picked at random from these two documents will clarify my total opposition to this project. This is the third application by Shell for the same project. The same inadequacies are in the E.I.S. My original worries have not been assuaged. I know you'll understand it is a matter-

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technical readers of the E.I.S. that I can only present my observations in layman's terms. It is the duty of the planning authority & its staff, to scrutinize the E.I.S. because they will continue to have responsibility for any fallout from said project proceeding as a result of their decision.

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(3)

Corrib Terminal Bellanaboy Bridge Earthworks Planning Report.

3.8 Groundwater Control

The control of groundwater and surface water will play a key role in the safe and successful execution of the earthworks. The construction works must maintain the balance of surface run-off and the rate of infiltration, principally to avoid the accumulation of excess water on, within or below the peat deposits. For the operation phase, a similar balance is required to maintain long-term stability.

Aim:

1° The control of groundwater and surface water during the execution of the ground works.

2° The balance of run-off and the rate of infiltration is also a necessity during the operation phase.

3.8.1 These drainage re-instatement measures will be in place well in advance of construction works and will provide control on surface drainage.

How do these proceedings compare with Bord na Móna who drain the bog for 8 years before milled peat is harvested at less than 1cm a year which means that 18 years drainage has occurred by the time 1 metre of peat has been removed.

In order to provide some level of control on the site's groundwater, it is proposed to install a system of dewatering vacuum wells to remove water from the underlying mineral soils and bedrock. This will also promote under-drainage of the peat. The wells will be sealed within the peat and vacuum assisted to help suck the water out of the relativity low permeability soils.

"Some level" seems to imply an experimental strategy. But we know there is no room for error here because "the control of groundwater & surface water will play a key role in the safe and successful execution of the earthworks."

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(4)

Over this period, the surface and sub-surface drainage will generate some control on the water movement within the peat and underlying soils and at least locally reduce the amount of water within the strata to be excavated. These control measures will lead to a reduction of seepage into the excavations, will improve the excavated surface condition and the condition of the materials being excavated.

3-8.1

This result is not creditable, because first of all there is no proof given - and the insistence of 'some control' is no guarantee that there will be a reduction in seepage or that an improvement will accrue to the materials being excavated. The admission of 'some control' contradicts the positive outcome predicted in rest of the sentence.

3.8.3 **Long Term Groundwater Control Measure**

The works will commence with the construction of the permanent settlement ponds and once completed all surface water will be diverted through the ponds.

This section of the E.I.S. is peppered with platitudes. The above statement (3.8.3) is not credible.

To assist in the long-term control of the groundwater, a deep drain will be installed along the southern end of the terminal, on the terminal side of the sheet-piled wall. The purpose of this drain is to collect the surface water percolating through the fill and groundwater rising from the underlying mineral soils by means of a more permeable rockfill layer placed underneath the fill and connecting to the perimeter land drain. This helps prevent build up of groundwater pressures underneath the fill and in the areas south of the terminal footprint.

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Once again we have the theory proposed for long term control of groundwater but what about long term trials to vindicate it.

3.9 Monitoring and Instrumentation

This will be done by constructing survey stations on the high ground and taking the foundations down to a stiff or dense or better bearing stratum.

Continuous monitoring of the instrumentation will be carried out to allow on-going geotechnical interpretation and assessment of the ground's response to the construction works. The actual ground response will be compared to the expected or predicted response. Should observed behaviour move outside that predicted, contingency measures will be implemented as required. These contingency measures will be developed in advance of the works and both the design and the construction teams will take the appropriate actions when necessary.

3-4

The data presented here outlines very precisely the unstable environment selected by Shell for the Gas Chemical Plant. The site at Ballinaboy is totally unsuitable for the project. There are too many unknowns and an attitude of 'let's see' engineering is not the correct procedure. The project will introduce into our community a social degradation with degrading consequences for the whole environment.

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(5)

4.3 Slope stability and groundwater

The expected groundwater yield is low and can be readily controlled.

This data can't be true, can it ?

4.6 Up hill slope stability of Peat Layer

In general all cut peat faces are supported by a gabion retaining wall. The wall is designed for the horizontal load applied by the peat conservatively assuming zero shear strength within the peat.

Is assumption enough for a guarantee of safety ?

The gabion retaining walls will be constructed by first strengthening the peat. This will be by means of strengthening the peat by mixing it with dry cement and/or by the installation of sheet piles to retain the peat in the temporary condition. For conservative design the strengthened parameters of peat are not used in the analyses.

What guarantee's are there that the peat will be strengthened by mixing it with dry cement ?

4.9 Stability of Fill Area

The peat layer on the retained side of the sheet pile wall have not been modelled as a stratum, due to program constraints however its effect has been modelled using a uniform load at the surface of the mineral soils on the retained side of the sheet pile.

'due to program constraints' is this a good enough excuse in determining the safety of project ?

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5.2 Site Investigation Interpretation

The strengthened peat is assumed to act in an undrained manner in the short and long term, as it tends to gain strength with time.

Projects of this magnitude should not be undertaken on mere assumptions - proven reliability is a priority. This project is a new enterprise not only to Erin but to Ireland.

5.3 Stability Calculations

All site roads will be supported on a block of strengthened peat.

Where are these blocks of strengthen peat in Ireland ?

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6.2 Site Investigation

Site investigation of the area around the settlement ponds is currently in progress (November 2003).

How can the E.I.S. be creditable with testing is still ongoing? How can assumed soil properties be verified? (cf. Table 6.1 settlement ponds)

The ground conditions at the location of the settlement ponds are such that there is typically a 3m thick layer of peat and organic soils overlying mineral soils of clay and sandy soil composition. The mineral soils are assumed to be about 3m in thickness, which are overlying weathered schist.

Once again these kinds of assumptions are worrying if the construction of the settlement ponds depends on them. The settlement ponds are central to the whole project and constructing them on geotechnical assumptions, which can easily be incorrect as well as correct, is to risk the least favourable scenario.

The strengthened peat is assumed to act in an undrained manner in the short and long term, as it tends to gain strength with time.

How will it not while its gaining strength? If the whole project is depending on assumptions surely its also true to say that the strengthened peat will act in a draining manner.

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11.4.14 Initial Excavation of peat from NE Terminal Corner

The peat will be removed firstly from an eastern access road to the Terminal Platform and then progressively across the area of the north-eastern corner of the Terminal Platform working in a westerly direction.

At the early stages of peat excavation there will not be an area of exposed mineral soils available for windrowing the peat. Windrowing consists of excavating peat from the existing peat blanket and placing into linear stockpiles on a mineral soil foundation using excavators. The linear stockpiles, or windrows, could be up to 3.5m in height at the centre. Bord na Móna have indicated that the peat located in the north-eastern quadrant of the site, which is thinner and drier than much of the rest of the peat over the terminal platform, should be of a sufficient quality to be loaded into the haulage trucks for transfer to the Srahmore deposition site without windrowing.

Gradually, this activity will expose the mineral soils providing an area where peat can be windrowed prior to removal and where a truck loading bay can be established.

It is envisaged that offloading of the better peat, without windrowing, is likely to continue for a period of approximately 10 days, by which time a sufficient area will have been cleared of peat to allow some windrowing to take place. There would then be a period of a further week over which some peat would be windrowed and some would be offloaded without windrowing – this is because there would not be a sufficient volume of windrowed peat available at this stage to meet a daily offloading rate of 4,000m³.

This data reads like a good story. It has a beginning, a middle, and an end. "Windrowing" could be a likely title for the story. It is mentioned nine times in the story in one way or another. But to meet the daily offloading of 4000m³ of peat almost I think maybe 'windrowing' is only an emergency extreme. There will be windrowing but not that expected. In one sense the story sums up for me the applicants attitude to Bellaney Bridge Earthworks report. "Let's feed them fiction and the facts will look after themselves."

This ends my submission re.

Corrib Terminal: Bellanabey Bridge Earthworks Report.

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Srahmore Peat Deposition Site: E.I.S.
Non Technical Summary

2 SITE DESCRIPTION

Area 5 was selected as the peat reception area. Area 6 was selected for the actual deposition of peat and a section of Area 7 will be utilised as a controlled overflow area in the event of rainfalls exceeding the design rainfall. The peat reception area to be utilised for off-loading of the peat is the closest area to the public road R313.

"Design" seems to infer that the said parties involved in this project will control the weather.

Approximately 450,000m³ of peat must be excavated from the terminal footprint to allow for the terminal to be constructed at the required level.

- The trees/scrub at the Bellanaboy Bridge Terminal Site will be removed from the terminal footprint by Shell and will be retained on site (Refer to Bellanaboy Bridge Terminal Volume)

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Here we see the mindset of the party to this development. They are prepared to visit an ecological disaster on a protected area rather than process the gas at sea.

- The peat (up to 450,000m³ cubic metres) excavated from the terminal footprint will be drained and windrowed and then transported from the Bellanaboy Bridge site to the cutover peatland at Srahmore by a fleet of forty tipper trucks. Each truck will have a load capacity of 18 tonnes but will carry approximately 11tonnes in order to minimise impact on the local and regional road network.

There will be a disastrous impact on the local and regional road network which is barely able to deal with the increase in traffic as it stands. This chaotic invasion of a convoy of tipper trucks will cause irreparable damage to the arterial network of roads.

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is envisaged that 4,000m³ of peat will be deposited daily over the six months of operation of the facility, which may be spread over two seasons depending on weather conditions. It

This statement admits there will be adverse weather conditions. How adverse? Could this cause the project to be extended into a third or fourth season? How is such uncertainty going to impact on tourism in the area?

A series of 5 new settlement ponds will be constructed, in addition to 2 existing settlement ponds, to capture silt mobilised by surface water runoff.

"Settlement ponds" - reservoirs for pollution of the waterways leading eventually to the pollution of drinking water and the demise of angling in the area.

3. CONSTRUCTION

The temporary buildings, equipment and services will be removed at the end of the deposition period. The removal of the peat reception, entrance road and link roads to Area 6 is envisaged to occur at the end of the stabilisation process, which is expected to be five years after the deposition is complete.

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What alternative strategy is in place if the expectations are not forthcoming? A scientific experiment on such a gigantic scale should never be allowed to take place. If the experiment fails the consequences to the environment, the flora & fauna will be catastrophic.

An experiment should be conducted on a small scale over a period of time. The results of the evaluated by the concerned parties. Then the right decision can be made.

There is the element of a reckless gamble in the project as it stands at the moment.

Festina lente.

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On completion, the site will be allowed to recolonise by natural species. Environmental monitoring stations, in accordance with EPA requirements, will be established at the site and monitoring will be continued post the closure of the facility.

Admittance here that the existing natural species will be disturbed in order to facilitate the peat deposition from the Bellonaboy site. Not only is the site in Ballinaboy to be degraded but the degradation will be extended another 11Km towards a more densely populated area, with three important rivers, and a lake that supplies drinking water to the Erris area.

This site, approximately 11km away from the proposed terminal site, is one from which peat has been harvested for a local power station. The peat from the terminal could be deposited at this site, which is saucer shaped with an extensive drainage infrastructure that was installed for industrial peat extraction.

The drainage system in Srahmore has been developed over many years of peat harvesting. Shell & Bord na Móna are going to deposition 450,000 m^3 of peat in two seasons, at a rate of 4,000 m^3 a day. How can one drainage system devised over a long period of time for excavating peat successfully contain the pollution put in train with the deposition of 4,000m^3 of slurry peat daily.

This is the optimum peat transfer and deposition method as (a) it requires minimal disturbance within the deposition site and (b) it will maximise the storage capacity of the deposition site.

This peat for deposition will have been hacked out of the ground from the Bellonaboy site, drained and maybe windrowed, loaded onto tipper trucks, carried over 11Km. and then loaded on Bailey trailers at a hardstanding peat reception area using two front-end industrial loaders. This peat will be hauled to the deposition area. We know that this work will not be done under Mediterranean conditions. This peat will be exposed to the elements especially in the deposition area, how will the procedure "maximise the storage capacity of the deposition site"?

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5 HUMAN BEINGS

It is not expected that there would be any negative impact on agriculture, forestry or fishing during or after construction so long as the mitigation measures outlined elsewhere in this EIS are implemented.

It is no good Shell stating "so long as the mitigation measures outlined elsewhere in the E.I.S are implemented" when they have not conducted trials on a smaller scale to prove that there won't be a negative impact. How can the drainage system that maybe work for harvesting peat as the most suitable drainage system for peat deposition.

6 TERRESTRIAL ECOLOGY

The development site is considered to have low local ecological value and consists primarily of cutover peatland with drainage ditches. No rare species, or species protected under the EU Habitats Directive, have been recorded from the site of the proposed development.

There will be an overall positive local ecological impact with the increase in local biodiversity through the replacement habitats establishing in Area 5, 6 and 7. The site will be dominated by soft rush and a number of species will colonise between tussocks. Possible re-instatement options include a process of rewetting the peat deposition site. This would promote the re-establishment of peat-forming conditions and re-instate a peatland ecosystem in place of the original Atlantic blanket bog complex.

Area 7 will most likely comprise a more wetland habitat. These replacement habitats will enhance the local biodiversity by providing substitute habitats for species already established in the local area. With time, the area could be incorporated into the existent network of cSACs and pNHAs to complement the existing conservation value of the Erris peninsula and expand the habitat available for wildlife.

The data provided here is a wish list. If one cast ones mind's eye 11 Km back the road from the Drehmore site we arrive at the Bellenabry site. Keeping in mind Shell's ecological credo regarding the Drehmore Biosphere one wonders is the applicant trying to justify the degradation to Bellenabry peatland ecosystem with the rejuvenation of the Drehmore site. But of course faith without good works is dead.

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7 AQUATIC ECOLOGY

The aquatic habitats which potentially could be impacted upon are the Munhin River, Owenmore River and Tullaghan Bay.

Every word in this statement is important. The facts as stated are also saying to leave well enough alone. There are no scientific studies provided by Shell to provide proof that "the aquatic habitats will not be impacted upon."
"Is leor mod don eolach".

8 SOILS AND GEOLOGY

A geotechnical assessment of global stability of existing and future conditions indicates that the Factors of Safety (FoS) available at 3 to >20 are well in excess of the standard FoS. The use of appropriate haulage and distribution equipment of peat emplacement will ensure the integrity of the internal roads during peat deposition.

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Have the necessary trials been conducted with the aforementioned haulage and distribution equipment or is the actual deposition of the peat from the Ballinaboy site the only experiment to be undertaken.
How can the actual undertaking be a justification in insuring the integrity of the internal roads during peat deposition.

9 HYDROLOGY AND DRAINAGE

The proposed peat deposition area at Srahmore is situated within the catchment of the Owenmore River. This watercourse flows approximately 140m to the south of the nearest edge of the proposed peat deposition area.

This is the section of the Owenmore River that is nearest to the sea. This is the most important part of the river — the salmon run to be precise.

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The main drain from the Bord na Móna property discharges to the Munhin River approximately 1km south of the R313.

With regard to the Munhin River, the EPA survey indicates that the water quality is slightly polluted at the sampling point just upstream of the confluence with the Owenmore River. Turbidity has always been a recorded feature of the River Munhin water quality with flows in the Munhin highly influenced by Carrowmore Lake.

In addition to the EPA surveys extensive groundwater and surface water baseline sampling has been carried out on and adjacent to the proposed site. The quality of the groundwater found below the Srahmore site is generally consistent with the established geological structure and reducing peatland environment.

But will be the quality of the groundwater in an increasing peatland environment – increasing suddenly and dramatically and what will be the consequences to Carrowmore Lake?

The surface water quality is quite good. However it does not naturally meet drinking water standards. The elevated concentration of ammonia, which is considered to result from the environment in which the water flows, would render the water unsuitable for potable supply. The high suspended solid concentrations are considered to result from the historical activities undertaken within the site. Remedial measures to remove sedimentation from the stream bed were being undertaken during the surface water sampling survey.

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It is quite evident from this data that there is serious pollution to the Munhin River. Why is this only being revealed now? Has this pollution any bearing on the suspension of angling on Carrowmore Lake during most of 2003. This pollution has resulted from the workings of the peat in the past. Now it is to be further polluted with the daily deposition of 4000m³ of peat slurry.

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- *Producer Responsibility to Encourage Reuse and Recycling of Wastes:* The project will take excavated peat to a cutover peatland where it will be stabilised and integrated into a replacement peatland habitat. The material, which will be removed during decommissioning, will be recycled or disposed of at landfill.

I thought a bog was a living thing - developing and growing over thousands of years. This Frankenstein experiment by Shell and Bord na Móna has the makings of a monster ecological disaster. They want us to believe we will witness a miracle at Srahmore.

This is my submission concluded. The potential for damage to the environment is one of my main concerns. There is also the danger to health from the aerial emissions from the multiple processes engaged in at the terminal when in operation. This proposal impinges directly on the Barrow more SAC. The effects of the physical and chemical changes and dynamisms to be introduced into the ecosystem by this proposal are not enumerated. Although I note elements of high quality in the EIS and technical supplements accompanying the application for planning permission I would still like to remind the planning authority, that the general language used, and the selected material denotes the EIS from a purely technical document to one of undoubted advocacy. This application by Shell should be refused.

Signed: Cornelius King.

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11. *Information on the possible impacts on water quality, aquatic ecology and surrounding peatlands arising from the use of the highly alkaline lime/cement binder to comparatively small parts of the site. The information should include technical information and assessments to support the use and appropriateness of this method of peat improvement in this location.*

A report on the proposed peat improvement works is provided . The proposed peat improvement works will have no impact on the quality of groundwater or surface waters, or their associated ecosystems, outside the Terminal boundary.

Shell's response to the council's request is not convincing. I hope you will see in my observations. from the text submitted by Shell that the information in its totality is not forthcoming. Experiments are still ongoing and mostly under laboratory conditions. They are applying for full planning permission without the necessary data supplied as requested.

Its not not enough to say at the beginning of the submission:
"The proposed peat improvement works will have no impact..." and to end their submission with a similar statement:
"The peat stabilisation work will have no residual effect..."

5 **Predicted Impacts**

The peat stabilisation works will have no residual effect on the quality of groundwater or surface waters or the associated ecosystems outside the Terminal site boundary.

The proof of the pudding is in the eating. The applicant has some of the ingredients in the bowl. To say the project is complete and ready for processing is only wishful thinking. It is still at the experimental stage and the consequence of giving planning permission will be a catastrophe for the area.

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Reponse to request for further information:

Item 11

1.4.2 Case Studies

Ireland - Research

Engineers from Trinity College Dublin (TCD) have undertaken studies on the engineering properties of two peats from the Irish Midlands that were mixed with a variety of binders (Hebib & Farrell, 2003). The study showed that the compressive strength of peat stabilised with cement was significantly greater than that of the original peat. However, the degree of improvement was markedly different for the two peats even though they had a similar organic content. This variation emphasises the importance of pre-construction laboratory and field tests, such as those being undertaken on peat samples from the Terminal site. In the TCD study, cement gave better results than pulverised fuel ash (PFA) or lime. The addition of gypsum or slag to the binder mix increased the strength in one peat but not the other.

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The two peat theory as outlined above is not why we are assuming in efforts to stabalize the peat at Bellacahy. The tests on the peat are ongoing under "laboratory conditions at T.C.D. There is no definite conclusion forthcoming from these trials. Therefore Shell have no cause to proceed with the stabilization on site when they don't know what the consequences will be. Therefore they are not answering the question asked of them by Meath County Council.

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2.1.4 Option selection

It is considered that column stabilisation or mass stabilisation, or a combination of the two techniques, will be feasible for the Bellanaboy Bridge Terminal site. It is proposed to use dry binder as it is considered easier to control and avoids the introduction of additional water to wet ground.

Compared to traditional methods of stabilising soils (e.g. piling) column and mass stabilisation are economical and flexible. They use less materials and energy, exploit the properties of the peat at the site and do not require the removal of peat from the site.

How can Shell be so confident in proposing to opt for column stabilisation or mass stabilisation, or a combination of both using dry binder when they are still awaiting the outcome of tests. (cf. 1.4.2)

2.2. Binders

2.2.1 Cement

Cement

Cement is a hydraulic binder. Amorphous calcium silicate hydrate and $Ca(OH)_2$ are produced when cement reacts with water. The strength, setting, hardening and stability of hydrated cement is due primarily to calcium silicate hydrate. As cement does not depend on a reaction with soil minerals it can be used to stabilise most soils including peat. Portland cement is the most widely used type of cement for soil stabilisation but other types are also suitable. Additional materials such as slag, ash or gypsum may be used with cement to augment its properties or reduce costs.

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How can Shell make such an exaggerated statement: 'cement does not depend on a reaction with soil minerals it can be used to stabilise most soils including peat'.
Are they not still awaiting the outcome of tests (cf. 1.4.2.)

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2.2.2. Sampling + laboratory testing.

2.2.2 Sampling and laboratory testing

At the time of writing this extensive ground investigations are underway at the site of the proposed terminal. As soils react in different ways to chemical stabilisation, comprehensive mixing trials are being undertaken in the laboratory. These trials will determine the appropriate binder composition for the soils in specific locations across the site. Shell has engaged SGI to undertake the sampling, testing and analysis. Samples of the peat were collected during February 2004 and are being tested to investigate their properties as detailed in Table 1. Previous laboratory testing has already been undertaken in the Summer 2002. The results of these preliminary tests indicated that the peat was suitable for stabilisation techniques to be successfully applied.

Here once again we are told that 'trials are being undertaken in the laboratory'. Saying that the peat was suitable for stabilisation techniques is not the same as saying that we have definitely able to stabilise the peats in Bellanabo footprint.

2.2.3

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2.2.3 Field verification

At the start of construction the engineering and environmental properties will be verified *in situ* by installing a number of trial columns or trial volumes (for mass stabilisation).

Field tests will confirm the strength of the stabilised soil, and the binder concentrations necessary to achieve the desired strength. Experience has shown that a more homogeneous mixture of soil and binder can be achieved in the laboratory than the field; laboratory conditions therefore may achieve strengths that are not necessarily achieved in the field.

Shell wants planning permission to be granted without proper confirmation of the peat stabilisation procedure. Bellanabo is not an experimental station in which Shell can mess around with an ecologically balanced environment supporting diverse flora & fauna to prove a point. The consequences of such an act will be irreversible.

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2.2.4 Quantities

2.2.4 Quantities

The quantity of binder used has a significant effect on the strength of stabilised soil. The amount and type of binder to be used at the Terminal site will be determined by laboratory and field tests (Section 2.2.2). It is currently estimated that there is approximately 156,000m^3 of peat to strengthen which will require up to 24,000 tonnes of binder and a further 178,000m^3 of mineral soils that may require strengthening which would require an additional 12,500 tonnes of binder.

Without any guarantees of the efficacy of this stabalising procedure Shell Ireland are prepared to let us know in an uncertain terms how much pollutant it's prepared to ferry to the Ballinlough site..

24,000 tonnes for the peat
12,500 tonnes for the mineral soils.

2.2.6. Option Selection

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2.2.6 Option Selection

Tests have shown that the hardening process can be retarded in soils with a high organic content so not all binders are suitable for use with peat. However, laboratory tests undertaken during the EuroSoilStab project showed that cement binders will stabilise almost any soil. To achieve the best results the binder must be mixed well in to the soil to produce a homogeneous soil/binder mix. The tests showed that the following binders combinations worked best with peat:

- Cement
- Cement & gypsum mix
- Cement & furnace slag

Similar tests using Irish peats (Hebib & Farell, 2003) show a significant increase in strength when just cement is used as the binder.

Following literature reviews, discussions with engineering colleagues and the SGI, Shell has determined that the preferred binder for use at the proposed terminal site is cement, or possibly a cement / sand mix. The binder quantity and possible proportion of sand will be determined on the basis of laboratory and field testing. The binder will be used in a dry form.

If the tests in the laboratory are still ongoing how can the applicant be so positive about the correct binder. Contradictions are very obvious here.

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3.1 P

3.1 Physical Properties

Under certain circumstances, cured cement will deteriorate in an acid environment. Tests have shown that the rate of cement deterioration is greatest where acid is flowing over the cement as this replenishes the acid and removes the reaction products. However, in the natural peat soil environment the rate of groundwater water flow is usually extremely low, and therefore the rate of any deterioration will be low. The rate of acid attack is also determined by the surface area of the cement exposed to the acid flows, and hence linked to the porosity and permeability of the cement: cement with higher porosity and permeability will undergo higher rates of deterioration. As the pH of the peat at the Terminal site is around 5.5 – 6.0, it is only slightly acidic and significant degradation of the stabilised ground is not expected.

There are two dubious statements evident here.

1° "However, in the natural peat soil environment the rate of groundwater water flow is usually extremely low"

2° "as the pH of the peat at the terminal site is around 5.5 – 6.0 it is only slightly acidic and significant degradation of the stabilised ground is not expected."

If these two statements are incorrect what then. How can the applicant be so certain of cause & effect if these are still ongoing in the electronics (Q. 1.4.2.)(Q.2.2.4)

What's the difference between 'acidic' and slightly acidic?

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3.2. Chemical Properties

3.2 **Chemical Properties**

The chemical reaction between the binder and the soil begins immediately and the pH of stabilised soil rises rapidly to 11-12 as curing begins. The speed of the chemical reactions depends on the type of binder and may take from one month to several months or even years (EuroSoilStab, 2002)

When cement is used as the binder, a stabilising gel develops between the soil granules due to pozzolanic reactions[1]. Cement rapidly reacts with the moisture in the soil and releases calcium hydroxide, which is highly alkaline (pH 12.5). The possibility of uncured cement or calcium hydroxide migrating into the adjacent drainage ditches and acidic peat habitats is addressed in Section 4.1 but is limited due to the speed of the reaction.

~~The principal constituents of cement are calcium silicates, aluminates, ferro-aluminates and sulfates (Table 2).~~ Small amounts of alkalis, lime and chlorides are also present together with trace amounts of chromium compounds. Typical Irish cement has to conform to the requirements of I.S. EN 197-1 for CEM 1 'Portland Cement'. Depending on the source of the cement, additional constituents may also be present such as pulverized fuel ash, limestone, and granulated blast furnace slag.

It is evident from the information here that the applicant is importing a pollutant into the peat which consequently will remain for years in the environment.

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3.3

3.3 Leaching Tests

The German Cement Works Association (Verein Deutscher Zementwerke – VDF) and the Institute for Construction Research (IBAC) in Germany have carried out extensive research into the environmental acceptability of cement products in the construction industry (www.vdz-online.de). During the reactive phase of cement and water environmentally relevant substances contained in the concrete constituents can be released into the environment relatively easily if they are present in mobile form. Substances that might find their way into the groundwater include soluble alkalis and trace element compounds. However, the research shows that trace elements in cement suspensions are predominantly insoluble and therefore unavailable for release. Hexavalent chromium is the only trace element that can be released from fresh concrete at concentrations that might be environmentally relevant. This research further confirmed that increased pH values and chromate contents occur only in the immediate contact zone of the cement (less than 60mm) and only for a very limited period of time (<24 hours). As hydration progresses, the dissolved chromate reacts so that in hardened concrete virtually all the chromium is in an insoluble state. Increased concentrations in very thin boundary layers and for short periods are not environmentally relevant and do not cause any lasting or significant adverse impact on groundwater (Brameshuber et al).

Table 3 Results of leaching test (DEV-S4) carried out on crushed concrete

Element	Content in cement	Content in leaching water
	mg/kg	mg/l
Arsenic	5	<0.0002
Beryllium	1	<0.0002
Cadmium	<0.5	<0.0001
Cobalt	10	<0.0002
Chromium	58	0.003
Copper	22	0.0008
Mercury	<0.05	<0.0002
Thallium	<0.5	<0.0002
Manganese	500	0.002
Molybdenum	1	0.0004
Nickel	28	0.002
Lead	17	0.001
Antimony	1	<0.0002
Tin	3	<0.0002

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This section of the applicants response to the county Council's Question 11 once again clearly shows the unsuitability of this site for the Terminal. In order to overcome insurmountable obstacles shell proposes to import into the area innumerable toxic substances that can and will leak into the environment. The weather is a huge factor in this whole project and wind and rain cannot be controlled.

"During the reactive phase of cement a water environmentally relevant substances contained in the concrete constituents can be released into the environment relatively easily."

"Substances that might find their way into the groundwater include soluble alkalis & trace element compounds."

Check the elements in Table 3 that will be imported with the binder into the environment.

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4.2 Receptors

4.2 Receptors

The following sensitive receptors are identified in the EIS and may be affected by the peat stabilisation process:

- Carrowmore Lake Special Protection Area (SPA) and candidate Special Area for Conservation (cSAC) – this large shallow lake and its associated areas of blanket bog are located approximately 1.5km to the southwest of the terminal site. The site supports a number of bird species, which are of international conservation significance, including Greenland white-fronted goose, merlin, golden plover, sandwich tern and arctic tern;
- Sruwaddacon Bay SPA – this site is part of the wider Glenamoy Bog Complex cSAC and is located approximately 2km north of the terminal site. It has been designated for its wintering wildfowl and its integral role in the local salmonid fishery;
- aquatic invertebrates;
- salmon and trout fisheries;
- willow scrub;
- badgers;
- otters;
- frogs; and
- local residents and the construction workforce..

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This section should be sufficient for the council to reject the applicants proposal for the import of the cement binder into the environment for peat stabilisation. Keeping in mind the list of dangerous substances listed in Table 3 and the consequences if they finding there way into Carrowmore Lake the main reservoir for the Erris area of drinking water should be enough for any right minded individual to halt such an enterprise going ahead. The common good demands it. There are too many imponderables. It is self-evident that Shell are still in the process of finding out the correct way to go about extracting the peat.

When in doubt, don't.

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4.3 Potential Impacts

4.3 Potential Impacts

4.3.1 Hydrogeology

Research has shown (www.vdz-online.de) that when ultra-fine cement binders are injected into water, significant effects on water quality are only detectable during the first 4 hours after the injection. Within 24 hours, the chemical composition of the test water was not significantly different from that of drinking water.

Subsurface flow in the area is minimal due to the near-surface water table and widespread waterlogging of the peat and underlying mineral soils and bedrock. The leaching experiments described in Section 3.3 demonstrate that the reactive phase of cement in water is limited to <24 hours and that the quantities of alkali and hexavalent chromium ions released in this time is insignificant. It is therefore considered that there is no risk of offsite groundwater contamination.

"It is therefore considered that there is no risk of offsite groundwater contamination". When there will be 36,500 tonnes of cement on site mixed with the peat and the mineral soils this is hard to accept. A small controlled experiment in the laboratory is no guarantee of the success of the project in the ground. One has only to live in this environment to fully appreciate the importance of factoring in the climate" – wind and rain.

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(11)

4.3.2. Hydrology

4.3.2 Hydrology

There are numerous ditches which drain the Terminal site, most of which have relatively minor flows. The project could impact on two separate catchment areas, with the boundary approximately following the eastern boundary of the Terminal. Ditches from the Terminal itself flow in a southwest direction, into the Bellanaboy River and subsequently Carrowmore Lake while run-off from the temporary construction area will flow to the north, to Glenamoy River and subsequently Sruwaddacon Bay.

Most of the shallow land drains on the Terminal site are frequently dry but there are some deeper ditches to the southwest and northeast of the site. The surface gradient and subsequent flow of surface water is towards a ditch in the southwest of the site, which empties into a sinkhole in the peat. This 1.5-2m deep hole only overflows after periods of heavy rainfall, when the overflowing water empties into a ditch (D16), which then flows adjacent to the R314.

The peat stabilisation process may result in a very localised and transient increase in alkalinity and/or sedimentation of these watercourses and drainage ditches, which under extreme circumstances could have knock-on effects on the aquatic ecology as described below. However, in reality, no adverse effects are anticipated.

Once again the final paragraph in this section is just wishful thinking. There will be knock on effects and the flora & fauna will be the recipients of the adverse effects not to mention the human inhabitants of the area.

4.3.3. Aquatic Ecology

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4.3.3 Aquatic Ecology

Vegetation

Cement or a combination of cement and sand will be used for the peat stabilisation, leading to the possibility of watercourse sedimentation. Cement and sand could settle on submerged aquatic plants and reduce the rate of photosynthesis. However, it should be noted that sand is naturally occurring in the local watercourses.

Any increase in pH of the water from the cement may reduce plant growth and alter the species composition. This could have a subsequent impact on aquatic fauna in terms of the suitability of frog-spawning sites, shelter for fish fry from predators, etc.

Macro-Invertebrates

The baseline data acquired at and around the Terminal site show a large population of aquatic macro-invertebrates such as mayfly, dragonfly and caddis fly larvae. Often used as biological indicators, the presence, abundance and diversity of these species indicates good water quality throughout the survey area. Most aquatic larvae are sensitive to environmental changes, particularly changes in pH and/or temperature. The sedimentation of watercourses by sand could smother larvae and in the long term modify the substrate to the extent that species composition is altered.

Fish

Sea trout and salmon are known to spawn in the tributaries of the Rivers Bellanaboy and Glenamoy. Although less susceptible to changes in pH than aquatic invertebrates (both species can tolerate a relatively high pH) (www.troutandsalmon.net) they can be indirectly impacted through a change or reduction in food sources. Sedimentation of the watercourses can smother fish eggs and damage fish gills through abrasion.

The applicant is admitting here that there will be adverse effects on the vegetation, macro-invertebrates and fish. This is as good a reason as any to withhold planning permission — the stabilisation proposed is a recipe for disaster in our environment...

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(12)

4.3.4.

4.3.4 Terrestrial Ecology

Willow scrub

Willow scrub is generally common throughout Ireland but it is relatively rare on the Terminal site and as such provides an important habitat for birds. There are two areas of willow scrub composed primarily of eared willow (*Salix aurita*) alongside the secondary / emergency access road which will be stabilised using cement injection. There is a risk of willow roots being damaged directly by machinery during the stabilisation process. Eared willow is known to prefer acid soils and as such the roots may atrophy if there is an increase in soil pH.

Badgers

The secondary / emergency access road which is to be stabilised is adjacent to an area of dense scrub where an active badger sett has previously been recorded (S5). It was noted during the survey (Volume 1 of EIS) that additional setts may have been overlooked due to the difficulty of surveying in dense scrub. There is a risk of direct harm to badgers if the sett is occupied when the peat stabilisation process begins.

Otters

Otters may be present on site throughout the year, however they are most active when opportunistically preying on frogs in the spring. Any adverse effect on common frog populations is unlikely to have an impact on otters as alternative food sources are abundant in the area. However, two day nests noted adjacent to the secondary / emergency access route may be used by otters. There is a drainage ditch adjacent to the access road which may

More of the same adverse effects here on the Willow scrub, Badgers, otters, Frogs.

4.3.5. Air Quality

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4.3.5 Air Quality

Handling and mixing of the cement-sand binding mixture will result in a minor and very localised increase in dust. However, the dust will land on the peat surface and will adhere, when the surface is damp, rather than being blown away. The most significant impact from cement dust will therefore be on the health and safety of the workforce, as discussed below. Generally, cement injection will stop short of the ground surface working platform which will overlie the area being stabilised. This will significantly reduce the potential for dust generation.

There will definitely be a detrimental effect on air quality — cement dust will be blown of site!

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(13)

4.3.8 People

Cement is a light powder that poses little immediate hazard. A single short-term exposure to the dry powder is unlikely to cause serious harm. However, when cement is mixed with water or becomes damp it undergoes an exothermic reaction and produces a strong alkaline solution. The heat is unlikely to cause thermal burns, but if the solution comes into contact with the eyes or skin it may cause serious chemical burns and ulceration. The eyes are particularly vulnerable and damage will increase with contact time.

Strong alkaline solutions in contact with the skin tend to damage the nerve endings first before damaging the skin, therefore chemical burns can develop without pain being felt at the time. Cement mortar and concrete mixes may, until set, cause both irritant and / or allergic contact dermatitis:

- irritant contact dermatitis is due to a combination of the wetness, alkalinity and abrasiveness of the constituent materials;
- allergic contact dermatitis is caused mainly by the sensitivity of an individual's skin to hexavalent chromium salts;

Generally, cement injection will stop short of the ground surface working platform which will overlie the area being stabilised. This will significantly reduce the potential for dust generation.

Fresh cement may contain traces of hexavalent chromium. Hexavalent chromium is a known allergen to some people although sensitisation normally requires months to years of repeated exposure. Wet cement is extremely corrosive and quickly destroys skin surfaces, which allows the hexavalent chromium to penetrate skin layers and enter skin cells. Once someone is sensitised they are usually sensitised for life and exposure to a small amount of cement may trigger a severe reaction. In an effort to improve workforce safety, the chromium content of cements has been decreased in recent years and the number of cases of chromate dermatitis has fallen.

There will be pollution effecting people in the vicinity of the site. Its noise shall be admitted this. But of course it will only be a temporary inconvenience. are the side effects of pollution on a persons health, always regarded as temporary in their results.

5. Predicted Impacts:

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5 Predicted Impacts

The peat stabilisation works will have no residual effect on the quality of groundwater or surface waters or their associated ecosystems outside the Terminal site boundary.

Don't accept this guarantee - all that has gone before contradicts this statement.

The peat stabilisation will have a residual effect on the groundwater - on the flora & fauna of the whole area - on the waterbirds and on Bannow more lake.

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In bringing my submission to a conclusion I would like to return to an earlier submission concerning the first E.I.S. submitted by Enterprise Energy Ireland. I think its pertinent to this present submission. I refer to the gas emission from the hypothetical cleaning station.

Emissions from Gas compressors:
CO_2; Co; NOx; SO_2; CH_4; VOC

Emissions from Three Generators:
CO_2; Co; NOx; SO_2; CH_4; VOC.

Emissions from Firewater Emergency Generator:
CO_2; Co; NOx; SO_4; CH_4; VOC

Emissions from Flare or Pilot gas use:
CO_2; Co; NOx; SO_2; CH_4; VOC.

This cocktail of gases will be hovering over the Bellanaboy site. Will not the heavy precipitation of the Erris area rain these gases down on the site. What degradation will this lethal concoction have on the cement binder in the peat? There is no allowance for cause and effect in Shell's submission. Is it an omission that should be ignored by Mayo County Council? I don't think so. These gases are serious pollutants and there will be repercussion for the environment when they rain down on the stabilised peat.

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The one aim of both applicants, Enterprise Energy Ireland originally and Shell subsequently is to solve the problem presented by the environment in order to procure planning permission for the Chemical Plant at Ballinaboy. But more serious problems seem to arise from the inadequate solutions proposed.

I think that at this late hour in the history of the Ballinaboy project it is time to call a halt and admit that the site at Ballinboy is possibly the worst site imaginable for such a project. The decent thing in the circumstances would be for Mayo County Council to take the applicant out of his dilemma and refuse the planning application.

The simple and common sense solution to the problem is to clean the gas at sea.

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Gortacragher
Rossport
Ballina
Co. Mayo

7911
€20 cash
1/4/04

1st April 2004

Mr Ian Douglas S.E.P.
The Planning Section
Mayo County Council
The Mall
Castlebar
Co. Mayo

Re : Planning Application Ref No P03/3343 as submitted by Shell E & P Ireland Ltd.

Dear Mr Douglas,

This is a submission based on planning application P03/3343 and the information submitted by the developer to Mayo County Council on 11th March 2004 in response to a request by Mayo County Council for further information on 17th February 2004.

As an owner of property within 0.5 km of the proposed terminal (refinery) I am concerned about the proposed development and its adverse effects as outlined at the various stages of the planning process to date. It creates a health and safety hazard which will result in my private property being totally devalued.

I request that Mayo Council Council refuse planning permission for this totally inappropriate development.

Yours sincerely

John Mc Garry

John Mc Garry (property owner in Bellygelly South, Glenamoy, Ballina, Co. Mayo)

SCANNED

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4 Pages including Cover

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03/3343

Observation and comments on ~~to~~
Corrib Gas Field Development:
Response to request for further information
including Appendix H: Traffic Management Plan

Ref - P03/3343

Submitted by - Martin Harrington
Tallaghan
Lyrsala,
Ballina,
Co. Mayo.

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Volume 1, item 17, 3.5

Having previously requested clarification on how Shell propose to deal with the issue of TENORM. I was surprised to see that there is still no information forthcoming and that they revert to reliable NORM. TENORM is a well documented phenomenon of the gas industry and the following information may be of some use to concerned parties:

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TENORM – "Naturally occurring radioactive material, not subjected to regulations under the Atomic Energy Act, disturbed or altered from natural settings, or present in a technologically enhanced state due to human activities, which may result in a relative increase in radiation exposures and risks to the public above background radiation levels".

Technologically enhanced – "Technologically enhanced means that the physical, chemical, radiological properties and concentrations [of NORM] have been altered such that there exists a potential for;

- Redistribution and contamination of environmental media (soil, water and air)

- Increased environmental mobility in

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- Incorporation of elevated levels of radioactivity in products and construction materials.

- Improper disposal or use of disposal methods that could result in unnecessary and relatively high exposures to individuals and populations via any environmental pathway and medium.
(Health Physics Safety NORM Working Group. See also Euratom Council Directive 96/29)

I would, therefore once again request clarification on the issue of TENORM.

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The Traffic Management Plan submitted on behalf of Shell completely disregards one vital point contained in the Letter of Consent issued by Minister Ivahey on 15-4-2002 which specifically states that - "Construction traffic management shall be such as to avoid peak hours and particularly those hours when children will be likely to be going to or coming from school". The failure to address this point leads one to conclude that either;

(a) The entire traffic management plan is fundamentally flawed and needs to be completely re-written in order to comply with the above - mentioned ministerial directive or;

(b) The aforementioned Letter of Consent is merely worthless paper to be conveniently ignored by the developer and other vested interests and therefore brings into question the validity and/or necessity of the entire project.

It would seem, therefore, that Mayo County Council has been placed in a somewhat invidious position. Rejection of the proposed traffic management plan would incur the wrath of Shell, and acceptance of it would imply that Mayo County Council ignore ministerial directives and have little or no regard for the safety of schoolchildren.

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Mayo County Council
Aras An Chontae
Castlebar

Ref No.: P03/3343

02/02/2004

Mr Martin Harrington
Tallaghan
Geesala
Ballina
Co. Mayo

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A Chara

I wish to acknowledge receipt of submission received from you on 30/01/2004 in connection with planning application by **SHELL E & P IRELAND LIMITED for CONSTRUCT GAS TERMINAL FOR THE RECEPTION AND SERAPATION OF GAS FROM THE CORRIB GAS FIELD, AND FOR A PEAT DEPOSITION SITE, RESPECTIVELY. THE DEVELOPMENT WILL CONSIST OF THE CONCURRENT DEVELOPMENT OF TWO SITES LOCATED 11 KILOMETRES APART, APPROXIMATELY, AND IDENTIFIED AS THE SITE OF THE GAS TERMINAL FOR THE RECEPTION AND SEPARATION OF GAS FROM THE CORRIB GAS FIELD IN THE TOWNLAND OF BELLAGELLY SOUTH AND THE SITE OF THE PEAT DEPOSITION SITE IN THE TOWNLANDS OF SRAHMORE AND ATTAVALLY, BANGOR ERRIS. THE DEVELOPMENT AT THE BELLAGELLY SOUTH SITE WILL CONSIST OF: A GAS TERMINAL FOR THE RECEPTION AND SEPARATION OF GAS INCLUDING PLANT AND EQUIPMENT; PROVISION OF 4,935 SQ M (GROSS FLOOR AREA), APPROXIMATELY, OF BUILDINGS; ACCESS ROADS; 40 NO. CAR PARKING SPACES; AND ANCILLARY DEVELOPMENTS, OF WHICH 13 HA, APPROX, WILL BE DEVELOPED INRESPECT OF THE GAS TERMINAL'S FOOTPRINT. THE PROPOSED DEV. WILL OF THE BELLAGELLY SOUTH SITE WILL ALSO CONSIST OF; THE EXCAVATION AND REMOVAL OF 450,000 CUBIC M at BELLAGELLY SOUTH SRAHMORE ATTAVALLY.**

The matters referred to by you will be taken into consideration by the Council before a decision is made on the application. Notice of the Council's decision on the

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Please note that in the event of an appeal being lodged by you, An Bord Pleanala will require a copy of this letter of acknowledgement.

Mise, le meas

RUNAI CHONDAE

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FAX
TRANSMISSION

Laurel Villa, Chapel Street
Belmullet, Co Mayo,
Ireland

DE / FROM	Edward Moran
A / TO	Mayo Co Council Ian Douglas Planning Officer

Page(s)	2
12 / 🕘	02/04/04 17:20

Message

I phoned just now about the possibility of having a single typing error on page 1 of my submission re PL03/3343 re Further Information corrected. Attached is a copy of the first page with the error near the end of paragraph 2 struck-through and the correct word in brackets beside it: that is 'on' is to be deleted and 'which' substituted in its place. Both are underlined for your attention only.

With thanks,
Edward Moran

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Rossport South
Ballina
Co. Mayo

1st April 2004

Mr Ian Douglas S.E.P.
The Planning Section
Mayo County Council
The Mall
Castlebar
Co. Mayo

MAYO COUNTY COUNCIL
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Re : Planning Application Ref No P03/3343 as submitted by Shell E & P Ireland Ltd.

Dear Mr Douglas,

This is a submission based on planning application P03/3343 and the information submitted by the developer to Mayo County Council on 11th March 2004 in response to a request by Mayo County Council for further information on 17th February 2004.

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We refer to the above and wish to make a number of brief observations.

The traffic management plan : During trenching operations along the pipeline route we know there will be a significant amount of peat removal, at least 5 km. up to the gas refinery and again on the Bord Gáis pipeline route from Ballinaboy to Bangor. We know this peat cannot be stored on the wayleave width, therefore we feel Shell E & P Ireland Ltd. have not accounted for the proper amount of lorry movements. It is also unthinkable that the developer proposes to haul all material to the landfall site on the Glenamoy to Glengad road via Dooncarton (recent landslide location).

Disposal of peat : Given the information supplied to Mayo County Council by Bord na Móna it appears that Bord na Móna plan to continue with their reputation i.e. to silt every river and stream in the area. Bord na Móna's plan to dry peat in windrows over eight days (covering the same windrows in adverse weather) is a complete joke.

The stability of the pipeline in deep peat is of major concern to us and has not been addressed at all by the developer. A specific committee was set up (Marine Licence Vetting Committee) to advise the Minister for the Marine and Natural Resources Mr Frank Fahey on issues relating to the environmental aspects of the proposed development, but we feel they were issues outside their remit i.e. peat issues and pipelines. We have now become aware that four members of the original seven are no longer on the committee of the M.L.V.C. This is very reassuring !!!

We have taken the opportunity to look at the submissions on the public file at the planning offices of Mayo County Council. There are a number of submissions based solely on personal gain and with a short term view. Our submission is based on health and safety. In its present form the proposed development is a disaster waiting to happen. Some of the submissions believe this project will benefit tourism in Erris. However we fail to see how a gas refinery with possible evacuation plans in progress because of gas leaks and flaring etc. would attract tourists.

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Let us say once again that we are not objecting to gas in Erris. However we have serious concerns in relation to the manner in which it is proposed to bring this gas ashore **at any cost**, regardless of our health and safety, damage to the environment and little or no benefit to the area. We trust that Mayo County Council will take our concerns on board and refuse to grant planning permission to this proposed application.

Yours sincerely

Mary Corduff.

Mrs Mary Corduff and family
(Concerned residents)

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Mayo County Council
Aras An Chontae
Castlebar

Ref No.: P03/3343

02/02/2004

03/3343

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Ms Mary Corduff & Familly
Rossport South
Ballina
Co. Mayo

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A Chara

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Mise, le meas

pp RUNAI CHONDAE

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Mayo County Council
Aras An Chontae
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Ref No.: P03/3343

02/02/2004

Mr Brendan Philbin
Rossport South
Ballina
Co. Mayo

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A Chara

I wish to acknowledge receipt of submission received from you on 30/01/2004 in connection with planning application by SHELL E & P IRELAND LIMITED for CONSTRUCT GAS TERMINAL FOR THE RECEPTION AND SERAPATION OF GAS FROM THE CORRIB GAS FIELD, AND FOR A PEAT DEPOSITION SITE, RESPECTIVELY. THE DEVELOPMENT WILL CONSIST OF THE CONCURRENT DEVELOPMENT OF TWO SITES LOCATED 11 KILOMETRES APART, APPROXIMATELY, AND IDENTIFIED AS THE SITE OF THE GAS TERMINAL FOR THE RECEPTION AND SEPARATION OF GAS FROM THE CORRIB GAS FIELD IN THE TOWNLAND OF BELLAGELLY SOUTH AND THE SITE OF THE PEAT DEPOSITION SITE IN THE TOWNLANDS OF SRAHMORE AND ATTAVALLY, BANGOR ERRIS. THE DEVELOPMENT AT THE BELLAGELLY SOUTH SITE WILL CONSIST OF: A GAS TERMINAL FOR THE RECEPTION AND SEPARATION OF GAS INCLUDING PLANT AND EQUIPMENT; PROVISION OF 4,935 SQ M (GROSS FLOOR AREA), APPROXIMATELY, OF BUILDINGS; ACCESS ROADS; 40 NO. CAR PARKING SPACES; AND ANCILLARY DEVELOPMENTS, OF WHICH 13 HA, APPROX, WILL BE DEVELOPED INRESPECT OF THE GAS TERMINAL'S FOOTPRINT. THE PROPOSED DEV. WILL OF THE BELLAGELLY SOUTH SITE WILL ALSO CONSIST OF; THE EXCAVATION AND REMOVAL OF 450,000 CUBIC M at BELLAGELLY SOUTH SRAHMORE ATTAVALLY.

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Mayo County Council
Aras An Chontae
Castlebar

Ref No.: P03/3343

28/01/2004

Ms Jacinta Healy & Others
Ballinaboy
Barnatra
Co. Mayo

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A Chara

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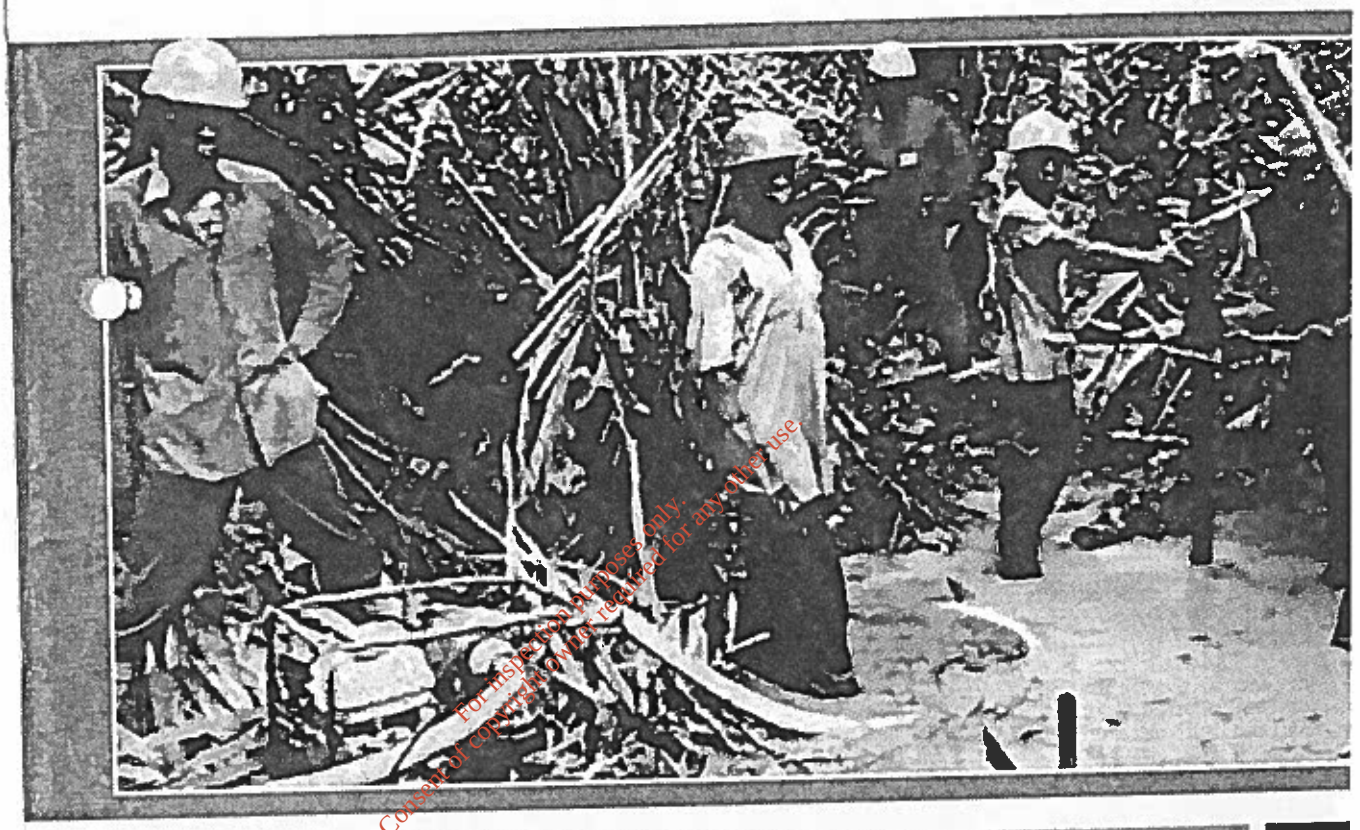
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March 7, 2004 The Mail on Sunday

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P03/

African oil



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TAINTED BY POLLUTION AND HUMAN RIGHTS CLAIMS

SHELL has been desperate to repair its tarnished reputation in Nigeria, where it has been accused of devastating the environment and failing to stop human rights violations.

Over the years, the group claims to have spent millions on successful community projects. But a secret memo from auditor KPMG, which has vetted a draft report by Shell of its charitable activities in Nigeria in 2003, tells a different story.

According to the memo, seen by Financial Mail, Shell has slashed spending on community projects in the strife-torn country and the auditors warn the company against exaggerating claims for its charitable works. KPMG's memo outlines a litany of overstatement and inaccuracies in the draft, saying that it contains over-reporting of project activity and assertions that appear to be unsupported, inaccurate or unbalanced.

Shell claimed to have 'rehabilitated' 22 town halls, four socio-economic centres and 18 civic centres. But KMPG's research showed merely that two town halls had been 'rehabilitated'.

Shell's budget for community projects in Nigeria was slashed last year. In 2002, the company spent $67 million (£42 million). In 2003, the budget was 'more than 50 per cent lower'.

A Shell spokesman said the company was now focusing on 'human development' rather than infrastructure. But KPMG's impression of overstatement in Shell's charitable efforts echoes a damning report into the company's work in Nigeria published in January.

Under the headline 'Sustained Misery. Shell in the Niger Delta', the Christian Aid report hammered the company's record. It reported: 'The region is a graveyard of projects including water systems that do not work, health centres that never opened and schools where no lessons have been taught.'

Shareholders, battered by the reserves scandal, may now welcome Christian Aid's final demand that 'Shell should make public its accounts for Nigeria'.

ing state assets at way below market ... was not comp

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Submission

Re

Applicant's Response to MCC Request

for

Significant Further Information

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Planning Ref. P03/3343

Planning receipt No. PLAN/0/6532

SCANNED

Submitted by: **Maura Harrington,**
Doohoma, Ballina, Co. Mayo.

Submission 8 pages
Appendices 15 pages
Mail on Sunday March 7 2004

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Glossary

SEC	Securities and Exchange Commission (USA)
USJD	United States Justice Department
FSA	Financial Services Authority (UK)
Euronext	Amsterdam Stock Exchange (and others)
AFM	Netherlands Financial Regulatory Body
KPMG	
PwC	Price Waterhouse Cooper

I wish to record my thanks to the Senior Planner, MCC, for the verifiable professionalism of his assessment of P03/3343 to date – a trait notably absent at Local Authority level heretofore.

I believe the tenor and content of the MCC Planning request for significant further information re P03/3343 has not been matched by the applicant's response. This is not surprising. It shows that, in one aspect, there is a dire consistency displayed throughout the planning history of the proposed Corrib Project – could be summarised by the acronym SOS – Same Old Shell, Same Old Story, Same Old S**** (in the all-encompassing context of peat, SODS – Same Old Dirty Shell etc. is equally apposite).

A person of high integrity has called P03/3343 an 'affliction' – he's right. It *is* an affliction for stakeholders and proper planners to once more have to wade through the assumptions, omissions and twittering twaddle that best describes the content of Volume 1 and Appendix A most recently visited upon us all by the same Mr. Tom Phillips, TPA & Associates. On a more serious note, the imposition of an affliction has human and civil rights implications and P03/3343 lies indisputably within this area.

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So it's once more unto the mire with the following observations. Before doing so, I wish to record the fact that the Co. Secretary, Mr. Condon eventually managed to clarify the closing date for receipt of submissions/observations re P03/3343. This is in contrast to P01/900 when many people, myself included, were given to understand that submissions in respect of this application would be accepted up to 12th September 2001 – by which time, of course, it was already a County Manager/Senior Planner/Frank Fahey *fait accompli.*

<u>Volume 1</u>

Item 1

Is the presentation of 7 grotty-looking photocopied pages gratuitously insulting or just plain stupid? Appended copy of Legal Notice, 31 July 2002 states conditions attached are 'mainly related to the protection of the environment'. Can 'written confirmation' from Frank Fahey and/or PAD PO Michael J. Daly really supercede Seveso II (even with Ó Cúiv 'no other option' rally-call)? While such claptrap was acceptable to the Co. Manager last time round (P01/900), and may or may not be acceptable to him this time round (P03/3343), can it be acceptable – in any verifiable professional manner – to the current Senior Planner?

Item 3

How many tankers? Are they factored into Traffic Management 'Plan'?

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Items 4,5

If Mr. Phillips would wish (his wishes having been entertained in P01/900) to treat this planning application as a rather large 'one-off' bungalow in a bog why weren't trial holes dug at the proposed location of the puraflo unit?

(agrément- ***n.approval by state of diplomatic representatives sent to it-n.pl. amenities,courtesies, charms, blandishments: embellishments, as grace notes and trills (mus).***

Item 10

Is the glorious ecological diversity nurtured between Broadhaven and Tullaghan over millennia really reducable to the badger, otter, hen harrier, corncrake and frog (and frogs don't count)?

Please see appended article 'Warning sounded on decline of species', Guardian download, 26:03:'04. Taking into consideration the RSK ENSR high profile per their website www.rskensr.com can they quantify what their 'contribution' – be it small or large - has been to this decline?

Given the apparent disdain/dismissal/contempt/arrogance inherent in all the applicant's forest-loads of paper to date, can P03/3343 be viewed as a sustainable planning option by anyone other than Minister Ó Cúiv, Frank Fahey, Bertie 'Swans and Snails' Ahern and the rest of the Fast Track Brigade?

Item 11

p.3,2nd para **'The areas proposed for stabilisation….as shown on?????**

1.4.2 **This variation…..such as those being undertaken… SOS/SODS**

Is there an example anywhere worldwide of 'stabilised' peat or pile-driven peat supporting a flare stack?

2.2.2 **Work not done; still conceptual – SOS etc.**

3.3 **Hexavalent Chromium? – to use the standard art analogy, I know nothing about hexavalent chromium but I don't like the sound of it!**

Please professionally and verifiably assess.

4.3.1 **In what way was the chemical composition of the test water different to that of drinking water?**

4.3.2 **States the 'bleedin' obvious' – any fool knows that a massive industrial assault on a pristine environment will smother, kill or otherwise annihilate species. Is this section to be read as an intention to slaughter and is it thrown down under the aegis of Ó Cúiv & Co.?**

Item 12

An incredibly arrogant admission that what reads as a pro forma 'small catchment' computer-modelling system was the only model used for Ballinaboy when the 'other methods' alluded to in passing would, presumably, have yielded more accurate and per standard rationality, a more damning hydrological/ hydrogeological scenario?

It's all very well to state that Bord na Móna 'design methodology' has been licensed by the EPA – the point at issue is whether complete compliance with all conditions attached to such licences can be demonstrably proven?

Item 13

From its incompetent conception, the proposed refinery at Ballinaboy has displayed distinctly irrational behaviour – couldn't stay still in one place and tried to play peek-a-boo with ABP Senior Planning Inspector. It is direly consistent that the raving refinery should now be joined by dingbat drains!

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Item 15
First admission in print that site specific rainfall data was collected at Ballinaboy – where is it? how comprehensive is it? how does it compare day on day/month on month/year on year with Belmullet Met Station data? was Ballinaboy rainfall used in pro forma computer-modelling referred to in Item 12?
Where is data for September 2003?

Table 2 would appear to raise more questions than it purports to address. March 2003 is over a year ago – where is the measured monthly data since then – or did it cease in anticipation of the 'right' ABP decision?

Item 16
Where will the rainfall run-off from the nice waterpwoof (*sic*) sheeting go to? Is it included in pro forma computer-modelling?

Item 17
What is TPS or CPI sludge?
Where is the location of the 'Other Permitted Reclamation Site'? What process/procedure was followed to identify and properly, professionally and verifiably assess this site?
Is there a valid waste licence in respect of this 'permitted reclamation site'? (If there is, is it comparable to the Third Secret of Fatima?).

Item 20
This response produces a nasty sense of déja vu – one knew the dingy photomontages in P01/900 were 'wrong' but didn't have the technical expertise to say why; at the ABP Oral Hearing it was acknowledged by the applicant that the plates lacked a chromatographic layer. Plates 13.1 and 13.2 do not look as if they were taken from exactly the same location. Plate 13.2 was obviously taken on a fine day night – why are there no computer-generated images showing the night light diffusion in all wet weather conditions, ranging from fine mist/drizzle to storm driven rain?
I would again point out that the only real model for a proper assessment of the night light pollution from P03/3343 is a comparative study using the GLANCRÉ Teo. plant at Muingmore as a base. The night sky pollution from this particular excrescence is panoramic. Please see appended articles, Irish Times, August 16, 2001; Fintan O'Toole 16:03:2004.

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<u>Volume 2</u>
Item 1
The admissions inherent in this response actually strengthen the contentions of those who are genuinely concerned about the effects of deposition of 450,000 m3 of disaggregated peat onto this site. The lower readings produced in times of no Bord na Móna activity at the site is a clear indication that, post cessation of all BnaM activity at the site, the riparian and marine environments heretofore affected by such activities would begin the process of self regeneration. Any proposal which would defer this process, not to mention actually impede it, is inimical to all principles of sustainability in planning.
I submit the following *verbatim* quote from Mr. James Moore, Deputy Regional Director of Dúchas (before it was subsumed) to the ABP Oral Hearing ref. PL 16.126073

'A hydraulic continuity and vertical leakage between surface, peat and groundwater in clearly identified in these extracts and any liquids entering the site have the potential to enter the groundwater and subsequently the nearby European sites.

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....I acknowledge the mitigation measures specified in the EIS but in my experience, such measures are never totally effective.
To conclude, I will refer again to your responsibility under SI/94/97:

> *a Local Authority or the Board, as the case may be, shall... decide to grant permission... only after having ascertained that it will not adversely affect the integrity of the European site involved*

I believe that the Board will be unable to make such an assertion!'

The above statement was made re Ballinaboy – it is equally valid re Srahmore/Attawalla. A copy of James Moore submission is appended for your consideration.

Item 2
Would prefer not to have to translate American dates. Again refer to Item 1, above.

Item 3
***3rd para* 'The initial process of depositing .....peat harvesting process.'**
This belongs in the litany of lunacies – *anybody* who would believe such drivel must live in perpetual fear of flying pigs!

There has already, over the lifetime of BnaM activities, been significant adverse change to Tullaghan Bay. Anybody living in the area, as I have done all my life, or talking to the local communities of Coolaba, Tullaghanduff or Tullaghanban would be only too well aware of that change – which is also illustrated by EPA Reports.

Item 5
A Habitats Map showing the Corrib Project area i.e. from Broadhaven to Tullaghan would be much more interesting to all concerned, with the obvious exception of the applicant!

Item 7
***Intro.* Please specify and professionally, verifiably assess the 'comparable activities undertaken by BnaM in the past'.**
***4.2* Who attended the Oweninny 'Qualitative Tests' on 27 November '03? Was it, as with so many Royal Dutch/Shell activities, by invitation only? If so, was MCC Senior Planner invited to attend? The prescribed bodies? Stakeholders? If not, why not?**
(Purely out of curiosity, what is the location of the 3-mile rough and bumpy pot-holed road upon which the peat was 'driven hard'?)
It comes as no surprise that BH and PF use only initials – if I'd produced such turdish stuff I'd stick with MH too!

<u>Cumulative Impact 'Response'</u>
'..same nature as those undertaken routinely by MCC' – I doubt it.
***4.1.1* Who in MCC 'will adopt suitable traffic management measures'?**
***4.1.2* Noise is one consideration – post Dooncarton and Derrybrien, what about cumulative <u>vibration</u> impacts? What is the inevitable fate of Glencullen N.S., a fine sample of vernacular architecture? My mother taught in that school as Miss Sweeney (1945/46). The building is now the property of Dr. T.K. Whitaker.**
***4.1.3* Where is the empirical comparative analysis to support the statement that air quality will still be good in comparison to that of roads through nearby villages and towns?**
***4.2* Again refer to quote, Item 1.**

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4.3 **Does the agreement of the NPWS and MCC with regard to Carrowmore Lake Complex fall under the Third Secret rule – or FOI 10(1)(a) – or can the rest of us see it?**
4.4 **I note the badger, otter, hen harrier, corncrake and frog-who-doesn't-count have been joined by the Greenland white-fronted goose. Nothing else remotely interesting between Broadhaven and Tullaghan??**
4.5 **Synergistic/synergistically are not impressive terms**
4.6 **Should we thank the kind 'Sorrs' for acquiring unto themselves the Glencullen road, renaming it a haul road?**
4.7 **Where is/are the waste disposal site/s to facilitate dumping of 41/33,000m³ of waste from Ballinaboy? Who are the 'site managers'? Has the 'pre-emptive' forward planning taken place or is it, like so much else, of the 'wing and a prayer' variety?**
5 **True, cumulative monitoring would occur <u>post</u> a Seveso type catastrophe; TOO LATE.**

'Hindsight may make for lofty regret but it is ultimately pointless'
Eileen Battersby, Irish Times, May 2001.

<u>Appendix A</u>

<u>Section 1</u>
p.2 para 2 **BnaM 'satisfaction' and proper, verifiable, professional 'satisfaction' with regard to the sustainable incorporated stability of disaggregated peat are not necessarily synonymous – and won't be, I hope.**
"living document" is not confidence inspiring.
1.2 **The Ballinaboy Bridge site 'designation' was obviously acceptable to Frank Fahey – up to, <u>and including</u> his last day in office; to Mr. Mahon/Ms. Gannon (Aug. '01) and to Ó Cúiv and his cronies at the Belmullet Rally, July '03. Such 'designation' has <u>not</u> been acceptable to local stakeholders, to a wide spectrum of non-vested interest groups and to ABP. The current arbiter of 'designation' is the MCC Senior Planner.**
p.3 **last full para – strains too many faculties to read 'coherent' here; should be deleted.**
p.5(i) **waste from Ballinaboy to be hauled along L1204 nearly a year after putative start – where would it be stored at Ballinaboy and where is it then going to?**
p.6 **As an 'artery', the L1204 is not in great shape and, to those with a titter of wit, not even a Maurice Nelligan of the Motorway would be able to do much with it!**
3.1 **Glencullen road also 'caters' for whole area covering Ballinaboy, Glenamoy, Pullathomas, Rossport, Ceathrú Thaidhg and all points NE. BnaM don't use that section of road.**
p.9 **Interesting to note reference to US Army Engineering Corps PCI methodology – lends credence to the Mad Max logistics which have absolutely <u>no</u> concept of rationality within the reality of Erris.**
4.1 p.9,10 **points 1-4 give lie to claim of 'routine nature' of proposed road works.**
4.5 **<u>2</u> 'in so far as is possible' – specify; <u>3</u> 'would ensure' – how? <u>4</u> how? <u>7</u> specify.**
p.17(b) **'unsuitable materials stockpiling and export' – details and verifiable professional assessment.**
p.18 **'empty trucks to carry stone in reverse direction' – what stone? where?? in what direction???**
5.1.3 **Would the demanded upgrade take 10 weeks, 11 weeks, 3 months?**
5.2 **'various loads which are unavoidably scheduled on top of the average daily peat payload' 'Certified weighbridge' apart, this type of elision must be addressed – what type of loads? what size are they? where are they coming from?**

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5.3 60,000 tonnes of unsuitable material is waste, for which a valid waste permit is necessary – throwing it 'opportunistically' into the back of trucks may seem acceptable to those involved in (used to?) such shenanigans but is hardly consistent with good planning practice; the question remains – where are 825 HGV's per month (for how many months) going to and on whose say-so are they going there?

5.4 On reading, seems as if this is timed for post grant of planning – no other option??

5.4.1 Lunatic Logistics

5.4.2 Can barcode be read through peat/mud coating or are there further employment opportunities for barcode cleaners – and should the indigenous population be forelock-touchingly grateful?

5.4.3 The admission of <u>will</u> to load trucks over self-imposed limit of 10 cu.m can be read as a certainty that this <u>would</u> happen – with what consequences?

5.4.4 Does Gárda writ run on 'haul roads'?

5.4.5 Nothing therein adequately addresses Mr. Francis Murphy.

5.4.6 TES should recommend strewing some brightly-coloured beads and bangles about – *should* adequately prevent theft of cones and barriers by nefarious natives.

5.4.7 Lighting requirements quite necessary to facilitate bead-gathering by natives.

5.4.8 Drivers giving way to laden trucks could be productively occupied in further strewage of beads etc.

5.4.9 Is pacing vehicle included in master plan?

5.4.10 Should the kind 'Sorrs' be thanked for allowing the natives out in a minibus occasionally?

5.4.11-5.4.17 Outside the parameters of any rational/facetious/ironic/cynical or polemic comment.

5.5 Found the pacing vehicle!

5.6.1 Post Dooncarton, I don't believe 'the Mayo Co. Council' will indicate a preference for the Inver route to Glengad – particularly if the funds granted to them specifically for the repair of roads and bridges has been expended as specified, which is the least the people of that area are entitled to.

(I wish to record, in the above context, that the Co. Manager appears quite vehement with regard to peoples' entitlements – his reply to me at 4.50p.m. 17 Feb.'04, when I requested that he sanction the price of a stamp to post copy of any additional information request to all those who had made submissions re P03/3343 was, *verbatim*, 'They'll get what they're entitled to get'.

Considering the further demented volumes of traffic proposed for the landfall assault on Glengad, Sruwaddacon, Rossport, Gortacreagher, why is no 'up-grade deemed necessary for the poor old L5244, L1202. L5245 and R313 section?

5.7 There is nothing remotely feasible, achievable or in any way connected to reality in this reckless, demented paragraph.

5.8 Prefer to read 'centre' – if proper catering facilities are to be provided at each centre/ center of activity, what effect will this have on the much vaunted increase in sales of sandwiches in local shops/pubs which appeared to be the *raison d'etre* for acceptance of this proposed excrescence in the first place?

6 What Safety File? HSA input?? (don't like the sound of 'any experience and lessons gained in the initial period will be studied and drawn upon to correct any deficiencies').

Would <u>you</u> buy a used TMP from this outfit?

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Section 2

In previous and current EIS's it was possible to chuckle gently over the contents of the Leopold Matrix, in essence, a thing of little value and less worth. There is no chuckling over the truly horrifying Risk Assessment Matrix presented here by TES. The allocation of risk ownership in respect of the peat haulage route is the stuff of nightmare. One must, to a degree, acknowledge the brazenness of S/hell legal advice but *why* do they think they can get away with it?

HIGH IMPACT RISK ACCEPTANCE

	MCC	Contractor	BnaM	Shell	MCC/Shell	Con/Shell	BnaM/Shell	Con/BnaM
A	4	2	0	0	1	0	0	0
B	2	0	0	1	0	0	0	0
C	0	4	0	0	0	0	1	1
D	0	0	0	0	0	1	0	0
Total	6	6	0	1	1	1	1	1

The basis for the assumptions on which the likelihood of risk was formulated would be informative. In other words, who carried out a QRA and who evaluated it? That said, of only 4 High-rated likelihoods presented by TES, the proposed ownership appropriation is as follows:

Contractor 1; BnaM 1; MCC/Shell 1; Contractor/BnaM 1.

In this horrendous proposal, it can be seen that S/hell is trying to get away with full risk ownership of ONE High Impact/High Liability item out of a total of TWENTY ONE – not a bad coup, but the success of this is premised on dealing with cretins.
This proposed project guarantees billions to the applicant, millions to the contractor, an ego boost to the management of BnaM and sweet damn all to MCC. An acceptance of such hellish risk ownership could only be construed as either cretinous or criminally craven.
For the record, the ONE S/hell appropriated risk (B8, Transitional) states the 'risk' as:

> 'School bus drivers and pupils are unaware of the scale of the transport operation and fail to commence their own safety measures in the first weeks.'

Is this item born of S/hell experience in Ogoniland and other unfortunate S/hell-smashed places? How many children, if any, have been killed in S/hell operations worldwide? If none, are S/hell implying that Erris bus drivers are stupid/negligent? That Erris children are unused to traffic and that Erris parents would be too busy picking up bloody beads or stealing bloody cones to look after their children?

If S/hell are willing to try to shift the blame for the RD/S 20% downgrade on to the SEC – see appended FT.com download – then what odds would TES offer that S/hell would ever admit any liability in respect of anything that befell the People of Erris or the Place that is Erris. Please also refer to appended Financial Mail on Sunday articles, March 7 2004 – *Raw greed in the African oilfields* and *TAINTED BY POLLUTION AND HUMAN RIGHTS CLAIMS.*
('Erris' Players and 'Erris' Tourism take note).

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Only those whose time is consumed by dodging flying pigs would be unaware of the current corporate upheaval within Royal Dutch/Shell. At time of writing, and for some time to come, RD/S shareholders are, and will remain, extremely perturbed. The publication of RD/S Financial Statement is delayed pending issue of joint Auditors Report by KPMG and PwC; the AGM has been postponed from April 23rd to June 28th. Former Shell Chairman Philip Watts is possibly facing criminal charges in the US; he will also be giving a deposition to US lawyers in the class action Ogoni case currently being heard in the US. RD/S is under scrutiny by the SEC, the FSA, AFM and Euronext. The newly appointed Chairman of Managing Directors, Jeroen Van der Veer and the *in situ* Financial Controller, Judith Boynton are 'driven hard' to answer multiple outstanding questions. Please refer to appended Times On Line download and Mayo News De Facto article, 31 March 2004.

Shortly after I downloaded Malcolm Brinded's address to the Oil and Money Conference in November '03 (appended to submission receipt no. PLAN/0/5532) I spoke with a Mr. Binto da Costa who represented himself to me as 'Mr. Brinded's right hand man'. At that time, 14 Nov. '03, I accepted Mr. Binto da Costa's assurance that he knew nothing about the proposed Corrib Project but I did ask that he consider familiarising himself with it. On 19 Nov. '03 Mr. Pyle made an unsolicited phone call to me at my home. Following Mr. Brinded's promotion in RD/S, I again made contact with Mr. Binto da Costa. This time I pointed to the much changed corporate circumstances at RD/S; the fact that a bad stakeholder story was the last thing either shareholders or management wanted at the moment; my belief that the Corrib Project as proposed would lead to the inevitable degradation of a First Class European environment and stressed the fact that Shell E&P Ireland Ltd. had abused and subsequently forfeited the trust of indigenous stakeholders. I requested that Mr. Binto da Costa appraise Mr. Brinded of these comments and further asked that a group from either Shell or Royal Dutch Head Office properly assess this proposed project for the first time. Mr. Binto da Costa refused my reasonable request and referred the matter back to Mr. Pyle. I do not consider this a failure on my part; I view it instead as one more example of typical RD/S duplicity. The reaction by Shell Centre, London to my stakeholder request is a mirror image of the elephantine corporate structure which has left its shareholders howling. In the timeframe within which P03/3343 must be professionally and verifiably assessed, the corporate beast that is Royal Dutch/Shell can most accurately described as a rogue bull elephant.

In that global context, since Mr. Phillips *et al* have provided little by way of relevance in the local context, I submit that it behoves the Senior Planner to refuse planning permission to P03/3343 on the grounds of rationality, common sense and sound, sustainable planning principles. As stated to the MLVC – and blithely ignored by them – the continued integrity of the Erris region depends on the integrity of those whose duty it is to sustain Erris for future generations.

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Maura Harrington.

April 1st 2004 (Fools' Day? Knaves' Day? NOTAB DAY! *Deo Volente*)

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Appendices

1. Legal Notice, DCMNR, pub. 31 July 2002, Western People

2. Warning sounded on decline of species

3. Irish Times article, 16 August 2001

4. Fintan O'Toole article I.T. 16 March 2004

5. James Moore submission

6. Ft.com download

7. Mayo News, De Facto, 31 March 2004

8. Financial Mail on Sunday articles, 7 March 2004

9. Times On Line download

10. NOTAB Song

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LEGAL NOTICE

DEPARTMENT OF COMMUNICATIONS, MARINE AND NATURAL RESOURCES

1. The Minister for Communications, Marine and Natural Resources hereby announces that the Minister for the Marine and Natural Resources (whose title has now been changed to that of Minister for Communications, Marine and Natural Resources) (hereinafter called "the Minister") has taken decisions as set forth in this notice.

2. The Minister has taken a decision to approve, subject to conditions, the working by Enterprise Energy Ireland Limited and its Co-Venturers of petroleum on an application for such approval for the working of petroleum in respect of which an Environmental Impact Statement was submitted in accordance with the requirements of Section 13A of the Petroleum and Other Minerals Development Act, 1960, as amended. Furthermore, the Minister also made a decision to grant a consent, subject to conditions, to construct a pipeline; the decision to grant that consent was made on foot of an application by Enterprise Energy Ireland Ltd and its Co-Venturers pursuant to Section 40A of the Gas Act, 1976, as amended. An Environmental Impact Statement was submitted with that application. Notice of these decisions is now given pursuant to Section 13A(8) of the Petroleum and Other Mineral Development Act 1960, as amended, and to Section 40A(8) of the Gas Act 1976, as amended, respectively. The above decisions relate to the plan of development for the Corrib Gas Field submitted by Enterprise Energy Ireland Limited and its Co-Venturers and for the construction of a gas export pipeline. The conditions attached are mainly related to the protection of the environment.

3. The Minister has made a decision to grant a Foreshore Licence, subject to conditions, to construct a gas pipeline over the foreshore. The decision to grant that consent was made on foot of an application by Enterprise Energy Ireland Limited and its Co-Venturers pursuant to the Foreshore Act, 1933, as amended. An Environmental Impact Statement was submitted with that application. Notice of the making of the Minister's decision is now given pursuant to Section 21A of the Foreshore Act 1933, as amended.

4. The Minister has also made a decision to grant a consent under Section 5 of the Continental Shelf Act, 1968, as amended to construct, alter or improve any structure or works in or remove any object or material from a designated area of the Continental Shelf.

5. All of the above decisions are made in connection with the Corrib Gas Field off the coast of County Mayo. The decisions by the Minister and information thereon have been placed, and are available, on the website (www.dcmnr.gov.ie <http://www.dcmnr.gov.ie/>) of the Department of Communications, Marine and Natural Resources. This decision and information thereon together with The Environmental Impact Statement have been made available and will remain available, until 31st August, 2002 for inspection by members of the public at the Department's offices at Leeson lane (Coastal Zone Division), Dublin 2 and Beggar's Bush (Petroleum Affairs Division), Dublin 4, at Ballina Garda Station, Ballina, Co. Mayo, Belmullet Garda Station, Belmullet, Co. Mayo, Glenamoy Garda Station, Glenamoy, Co. Mayo and at Bangor Erris Garda Station, Bangor Erris, Co. Mayo.

Department of Communications, Marine and Natural Resources, Leeson Lane, Dublin 2.

July 2002

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The world has changed since you woke this morning

Warning sounded on decline of species

Tim Radford, science editor
Friday March 19, 2004
The Guardian

Scientists have produced the first comprehensive evidence that the diversity of butterflies, birds and plants is in decline in the UK. They say their research supports the argument that mass extinction threatens life on Earth.

In the past 20 years, according to a study in the US journal Science today, about 70% of all butterfly species in Britain have shown signs of decline. About 28% of plant species and 54% of bird species also declined in areas studied over long periods. The finding comes from government-funded scientists using data painstakingly amassed over the past 40 years by 20,000 skilled naturalists .

Sandra Knapp, a botanist at the Natural History Museum, said the UK survey gave a crucial message for the world: "The lesson and the warning are there for all to see. Britain, by virtue of its well-known and well-studied biodiversity, is the canary for the rest of the globe.

"This adds enormous strength to the hypothesis that the world is approaching its sixth major extinction event," said Jeremy Thomas of the Natural Environment Research Council, who led the study of butterfly populations. "The others appear to have been cosmic events, either from outer space coming in or some major perturbation - volcanos, whatever - within the Earth. So they are believed to be physical events.

"You could say this latest one is an organic event: that one form of life has become so dominant on Earth that through its over-exploitation and its wastes, it eats, destroys, or poisons the others."

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The 600m-year fossil record shows a pattern of continuous evolution and extinction. But naturalists now think that extinction rates are at least 100 times greater than the natural "background" rate because of pollution, habitat destruction, hunting, agriculture, global warming and population growth.

Hard evidence, however, has been based only on research into a small number of species, mainly birds. But birds make up less than 1% of all species, while insects make up more than 50% of life on Earth.

Dr Thomas and his colleagues analysed six surveys recording the presence of almost all of Britain's native plant, bird and butterfly populations in the past 40 years in 10km grid squares.

One third of plant, bird and butterfly species have disappeared from one of the squares they occupied 20 or 40 years ago. About 70% of butterflies show some decline and two species have become extinct.

"We are going to lose a lot of species, there is no doubt about that. It is accelerating, this decline, for a lot of species and we are going to lose more than we have lost in the last 20 years. And it is just going to go on and on. But it is not all bad news, because the conservation bodies have done wonders," Dr Thomas said.

A second study in Science showed that pollution by nitrogen compounds, from industry and agriculture, could be linked to the loss of species from native grasslands.

Carly Stevens, a PhD student from the Open University and the NERC centre for ecology and hydrology in Huntingdon, examined 68 sites and found that rising levels of pollution by oxides of nitrogen and ammonia threatened 40% of selected native grassland plants.

Where nitrogen levels were low, plant variety increased. Where they were high, the number of species in any patch of grass was reduced. Although nitrogen is a fertiliser, many plants flourish best in poor nutrient conditions, and these were most threatened by increasing nitrogen levels from car exhausts and intensive livestock farming.

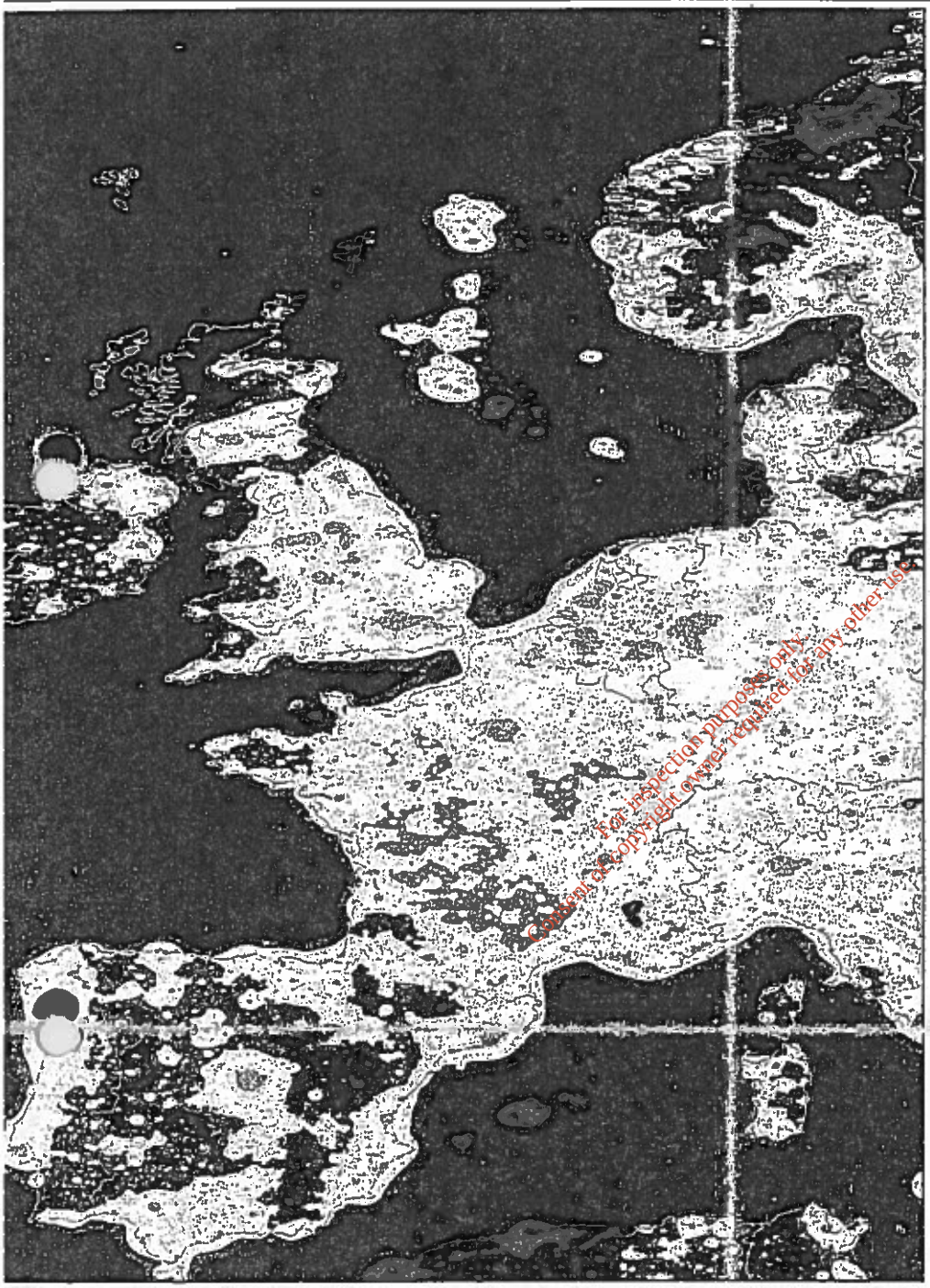
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TODAY



Contact Science Today by emailing Dick Ahlstrom, Science Editor, at dahlstrom@irish-times.ie



Europe's light pollution hot spots in an artificial night sky atlas by Dr Pierantonio Cinzano of the University of Padua in Italy

Bright light pollution is depriving Europe of dark sky

The sky at night is progressively getting brighter as light pollution spreads over Europe, writes Peter Foote

ONLY one in a hundred people in western Europe can expect to see a truly dark sky when they look upwards at night, even on a clear night. The picture is the same in the USA. Many of us are being deprived of the spectacle of the Milky Way and some of nature's other night-time shows.

This is the result of light pollution. It spills from our towns and motorways and is revealed in the *First World Atlas of Artificial Night Sky Brightness* by Dr Pierantonio Cinzano of the University of Padua in Italy. The atlas will be published in the *Monthly Notices of the Royal Astronomical Society*.

"Large numbers of people in many countries have had their vision of the night sky severely degraded. Our atlas refers to the situation in 1996-7. It is undoubtedly worse today," said Dr Cinzano.

Over 99 per cent of EU US populations and two-thirds of the world's population suffer light pollution. In the regions of highest population in the affected countries, the sky is always brighter when there is a half moon. For some, the sky never grows darker than a "nautical" twilight — on a clear evening when the sun slipped below the horizon but night has yet to darken, a period of between 40 and 80 minutes.

To produce their atlas of sky brightness, Dr Cinzano and Dr Chris Elvidge of the National Geophysical Data Centre in Bolder Colorado used satellite images to show artificial lights on night-time Earth, combined with computer modelling.

"We take the satellite data and then use an atmospheric model to calculate the downward scatter of light back to the ground," Dr Elvidge said. The team are working on further improvements which take into account other factors such as terrain and air-moisture. They claim the adverse effects of light pollution have not been fully studied because, until now, the comprehensive data has been lacking.

It is not just star-gazers who may suffer from the lack of nocturnal blackness. Invasive lighting spilling from uncaring neighbours is a cause of stress. Add to this, environmental damage is caused by excessive demand placed on electricity to keep lights burning.

Darkness is a stimulant for some of the body's natural defences. Melatonin is a powerful agent in fighting disease such as breast and prostate cancer, and the body produces it in the absence of light.

Outdoor light pollution could be a factor but Dr Elvidge said: "Probably most people would be more affected by indoor lighting which is much stronger."

These islands fare better than most of Europe in terms of light pollution, according to the atlas.

Most of England and Wales suffer light pollution up to nine times the natural levels, the west of Ireland and north-west Scotland have large tracts that are virtually unaffected.

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Opinion & Analysis



Fintan O'Toole

Bulldozing history and landscape

A hundred years before the birth of Christ, the Greek writer Diodorus Siculus wrote of an island far to the north of the Mediterranean world. Drawing on now-lost accounts which were hundreds of years older still, he described this island with a "mild climate" which lay "beyond the domain of the Celts".

Here, he claimed, was the birthplace of Leto, mother of the sun god Apollo. For this reason, he wrote, the sun god was venerated there in a "splendid enclosure" which contained a round temple. His account hints at a cult of rebirth involving the sun, the sky and the wind in a mythic ritual of impregnation and regeneration.

Diodorus's account may have nothing whatsoever to do with Ireland and Newgrange. But it just might be a translation into the terms of Greek myth of what were even then ancient rumours of the great round temple that is penetrated by the sun during the winter solstice, giving birth to a new year and renewed life. Since the sacred complex at the Boyne Valley was as ancient in Greek times as the ancient Greeks are to us, it is not at all fanciful to think that some knowledge of its cults and power had made its way into the classical cultures of the Mediterranean.

Move forward 2,000 years and there is another extraordinary testimony to the radiant potency of the culture whose holy places stretched between the Boyne Valley and Tara. Everyone now knows about the sun's entrance into the Newgrange tomb.

But when the site was being excavated in the 1950s and early 1960s, there was no reason to suspect such a thing. The occurrence is unique to the place, and the aperture which allows the light to enter had been hidden for at least a thousand years. Yet the archaeologists who were conducting the excavation were told by locals that some such phenomenon was connected with the mound. A vague but truthful memory had lingered over generations.

Does any of this matter? Not in the straightforward, simple sense that getting to work and earning a living and coping with the stress of contemporary life matters. It doesn't put food on the table or money in the bank.

But in a broader sense, it is important. Some kind of respect for the wonder and fragility of human survival has become almost as necessary to us as food and shelter. We can no longer take our species for granted and we need to be reminded of that fact or else risk extinction.

And it matters in a more local way, too. A society that has changed as rapidly as ours and that has such an awkward and unresolved relationship to its history needs to be reminded that the past is both long and deep and that nothing ever really goes away. Adopting the way archaeologists view the world – as a set of layers, some closer to the surface than others – is the only healthy solution to our society's neurotic swings between obsession and amnesia.

> A huge 34-acre floodlit junction a kilometre from the Hill of Tara

All of this is a way of saying that the plans to drive a big motorway through this sacred landscape are the epitome of the crass, vulgar values that now holds sway here. The M3 will not go through the Boyne Valley, but it will bisect the spiritual centre of the world of those who built and used the Boyne Valley monuments. It will include a huge 34-acre floodlit intersection a kilometre from the Hill of Tara which has been, as Dáithí Ó hÓgáin puts it, "a sacred centre from time immemorial".

As a stellar array of national and international scholars wrote in a recent letter to *The Irish Times*, the Tara/Skryne valley which will be cut in two by the toll road, is "one of the most culturally and archaeologically significant places in the world.... it holds a special key to understanding the continuous progression of European civilisation".

The motorway will be of dubious value, and a number of perfectly sensible alternatives has been put forward. But it will be a nice little earner for private investors. The taxpayer will put up at least half of the €680 million cost, but whoever puts up the other half will get a 30-year licence to charge two separate tolls along its 47-kilometre length. The profits will be vast – probably double the size of the investment.

The decision to press ahead with this monstrosity is in itself an eloquent statement of contemporary Irish values. A few decades ago, there was a living memory in Co Meath of things that stretched all the way to prehistoric times.

Now, memory itself – the sense that there are layers of meaning both literally and metaphorically beneath our feet – is a bloody nuisance. There is money to be made and the prospect of cutting a few minutes off a journey. Anything else is an irrelevance. People, history, cultures, landscapes, the delicate web of connections that binds us to one another and to the earth, are so much debris to be bulldozed aside.

When the Taoiseach loftily dismisses all infidels to the great god of motorways as "swans, snails, and people hanging out of trees" he gives voice to a deep contempt for anything that can't be measured in tonnes of concrete and loads of money.

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Dúchas The Heritage Service

An Roinn Ealaíon, Oidhreachta, Gaeltachta agus Oileán
Department of Arts, Heritage, Gaeltacht and the Islands

National Parks & Wildlife
Lagduff More
Ballycroy
Westport
Co. Mayo.

Phone: 098-49996
Fax: 098-49997

An Bord Pleanála 18.02.2002.

Re: **Planning Application Reg. Ref. 01/900** by Enterprise Energy Ireland Limited to Mayo County Council for permission for gas reception and treatment facilities and associated works at Bellagelly South, Bellanaboy Bridge, Belmullet.

Submission of James Moore, Deputy Regional Manager, National Parks and Wildlife Service, Dúchas The Heritage Service.

INTRODUCTION

I am concerned that this proposed development, may, during the construction phase, have a significant adverse affect on three "European sites" namely: Glenamoy Bog Complex (Sruwaddacon Bay), Carrowmore Lake and Broadhaven Bay. The map attached indicates sites designated as Special Area of Conservation in Mayo, Galway and Clare. The site codes are as follows: Glenamoy Bog Complex, 0500; Carrowmore Lake Complex, 0476; Broadhaven Bay, 0472.

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These three sites are designated candidate Special Area of Conservation and Special Protection Area. These designations are made under COUNCIL DIRECTIVE 92/43.EEC and COUNCIL DIRECTIVE 92/42/EEC otherwise known as the Habitats Directive and Birds Directive. In the context of the Habitats Directive such sites are referred to as "European sites". These directives were transposed into Irish law on 26 February 1997 by the EUROPEAN COMMUNITIES (NATURAL HABITATS) REGULATIONS, 1997; STATUTORY INSTRUMENT 94 of 1997.

Information on RAMSAR sites is attached for your information and you will note that RAMSAR sites have no legal protection in Ireland.

CONCERNS

Carrowmore Lake is 4 km. distant from the northern peat repository area and 3.5 km. distant form the main site. Sruwaddacon Bay, which is the inner portion of Broadhaven Bay, is 1.5.km. distant from northern peat repository area and 2.km. distant from the main site.

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The National Parks and Wildlife section of Dúchas The Heritage Service, is the statutory body with responsibility for nature conservation and is obliged to protect such sites. Sole responsibility does not rest with the National Parks and Wildlife Service however, under Part 4 of S.I. 94 of 1997 specified Government bodies also have certain obligations. Section 27(3) specifically relates to local authorities and An Bord Pleanála and states:

'a local authority or the Board, as the case may be, shall, having regard to the conclusions of the assessment to which paragraph (1) relates, decide to grant permission for the proposed development only after having ascertained that it will not adversely affect the integrity of the European site concerned'.

Included in further information received by Mayo County Council and passed to us was a Hydrology and Geohydrogeology Report. That report identifies permeable deposits such as sand, gravel and sandy clay from 1.5 – 5m deep. These lie beneath peat, much of which is also permeable, (Appendix L).

Section 5.2 refers to new peat repository site and states:

'Presently the site is underlain by peat and sandy gravelly clay over weathered bedrock (occasionally weathered to a sand) which in turn overlies unweathered bedrock. Shallow groundwater is likely to flow principally through a thin shallow peat horizon probably towards the nearest drain. Deeper groundwater is likely to flow through the sand (completely weathered bedrock) where present and through weathered bedrock towards the northwest, northeast and southeast (the lowest parts of the site) where it probably emerges as baseflow in the Glenamoy river and Sruwaddacon Bay'.

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Other water discharge features include a layer of weathered rock, which according to section 9.9.3 of the EIS:

'It is considered that this layer may act as a preferential horizontal pathway for groundwater beneath the site'

A "hydraulic continuity" is also described in section 5.1 of the Geohydrology report, which states:

'The presence of a significant thickness (~5m) of saturated peat will at least partly replenish of deeper groundwater as a result of vertical leakage'.

This information, provided by the applicant, does not alter my concerns; indeed these extracts would appear to confirm them.

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CONCLUSION

A hydraulic continuity and vertical leakage between surface, peat and groundwater is clearly identified in these extracts and any liquids entering the site, has the potential to enter the groundwater and subsequently the nearby European sites.

I believe that surface water and groundwater from the site will discharge from the site via drains, streams and rivers and especially via permeable deposits. Any liquid pollutants occurring within the site would therefore constitute a threat to the European sites.

These pollutants may typically include diesel, oil, lubricants, hydraulic fluid, detergents, chemicals, phosphates and nitrates. The source of such pollutants could realistically be an accident, a burst pipe, poor maintenance of machinery, phosphate mobility, inadequate number of chemical toilets, poorly maintained chemical toilets, negligence and human error. I acknowledge the mitigation measures specified in the EIS but in my experience, such measures are never totally effective.

To conclude, I will refer again to your responsibility under SI/94/97:

'a local authority or the Board, as the case may be, shall, having regard to the conclusions of the assessment to which paragraph (1) relates, decide to grant permission for the proposed development only after having ascertained that it will not adversely affect the integrity of the European site concerned'.

I believe that the Board will be unable to make such an assertion!

END

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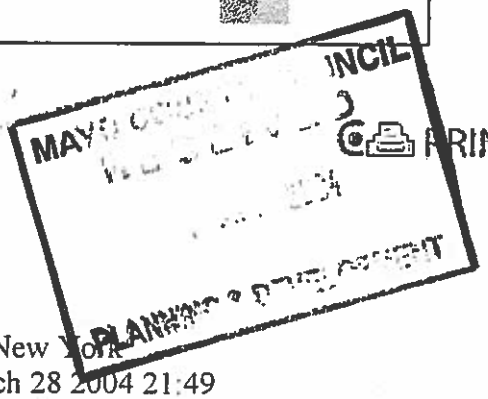
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Shell plans to deflect blame over reserves

By Carola Hoyos in London and Adrian Michaels in New York

Published: March 28 2004 21:49 | Last Updated: March 28 2004 21:49

Royal Dutch/Shell, the global energy group, is preparing to insist the company was not at fault when it wrongly booked 3.9bn barrels of oil and natural gas. It will claim instead that it was the victim of ambiguous US regulations.

The defence strategy is expected to focus on the Securities and Exchange Commission's rules governing the accounting of proven reserves. The rules date to 1978 and have become more challenging to interpret in light of new technologies and a more active futures market. The SEC has updated the industry on interpreting its regulations at least four times since 2000, and has discussed the issue with companies in private.

Shell would insist it took appropriate measures when the SEC's guidance made it aware of possible problems, people close to the company's defence said.

People following the controversy say the regulations on reserves leave room for manoeuvre and that Shell may have some success in shifting blame.

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But they added that Shell's proposed strategy would be difficult to maintain if deeper executive wrongdoing was uncovered or large-scale reserve miscalculations were found to have been reported for a significant period.

The report of an internal audit committee will be central to Shell's ability to shift part of the blame to regulators. If the panel finds evidence that the company was aware of problems long before it made them public to investors on January 9, lawyers may have to change the approach.

That report - whose preliminary findings prompted the boards of Royal Dutch and Shell Transport and Trading, the parent companies, to demand the resignations of Sir Philip Watts, chairman, and Walter van de Vijver, head of exploration and production - is expected to be released in about five weeks, according to company officials.

The SEC does not comment on individual investigations. However, people close to the inquiry said the US regulator was still at an early stage in its work. It has not yet formally interviewed Shell officials.

Shell is being investigated by the SEC, the US Department of Justice and UK and Dutch regulators. It also faces private lawsuits after it reduced its booked proven reserves by 20 per cent in January, explaining that they had been prematurely booked with the SEC as proved and ready to develop.

Jeroen van der Veer, Shell's new chairman, has denied knowing the extent of the reserves problem, but said he was aware of some exposures on reserves bookings. Mr van der Veer, who was head of

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chairman. However, the type of candidate will depend on whether the Dutch and UK boards agree to be merged into one unified entity as some investors and non-executive board members are advocating.

xref Feeling the pressure, Page 13 Rise of consultancies, Page 19

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Shell's reserves and reservations



SHELL RESERVES

SHELL is battling on a few fronts this weather. The Corrib project is ongoing but one has to ask, for how much longer? Will the new men at the helm of Shell make changes? Will Corrib be deemed too costly for the future of Shell? They reclassified their reserves at the start of the year after they discovered they had overestimated by 20%. That amounted to just under 4 billion barrels of oil. In typical Shell style the mess did not end there. They have now reclassified almost a further 500 barrels of oil, wiping them off their reserves. Their auditors have refused to sign off on the accounts. Investigations have been mounted by state agencies in three countries and they have lost their chairman, Sir Philip Watts, and Walter van de Vijver, their head of exploration and production. Both have walked the plank in the past two months.

LOCAL POLITICS

SHELL has a huge local interest with the Corrib gas project. Their latest (third) planning application for a gas refinery at Bellanaboy in north Mayo is currently being considered by Mayo County Council. The council requested further information in February on the application submitted last December. That further information was furnished in two x A4 folders dealing with the questions raised by Mayo County Council. One of the folders is devoted to a Traffic Management Plan for the project, which, incidentally, involved in or around 100,000 traffic turning movements as 450,000 cubic metres of peat is removed from Bellanaboy to Shramore on the outskirts of Bangor. The Castlebar office of the Galway firm, Tobin Consulting Engineers prepared the Traffic Management Plan. Traffic Management Plans are not new to this project – at least on paper. One was to have been prepared for the last planning application but attempts by several people to view the document have failed - nothing to do with eyesight, less to do with hindsight but more to do with insight. Perhaps the powers that be in Mayo County Council and Shell would oblige with a copy— if it exists at all.

For those with the stomach for same, the further information supplied is best ingested along with a helping of a report submitted as an objection to the Bellanaboy refinery project by a local Erris man, Brian Coyle, who runs his own engineering company in Galway. He has produced a report that deserves a widespread readership, especially in Mayo. Too many people are accepting, without question, the words of those promoting the project. Brian Coyle raises a series of questions about the whole project – why is an onshore terminal being proposed for this development? There is no precedent for such a development. Why is Shell now proposing to remove up to 450,000 cubic metres of peat from the site? Their earlier applications rule this task out! This type of work was never carried out before. Even with the involvement of Bord na Móna in this part of the project there is no precedent for this because it has never been done before. Why is Bord na Móna getting so involved? Who will be responsible if pollution results from removing this peat and it runs into the waters surrounding Shramore and the salmon spawning grounds. Is there a history of Bord na Móna 'carelessness' with peat depositions causing silting in various areas? Has the area near Shramore already been affected by silting? If there is a pollution problem and the blame lies at the door of Bord na Móna, does that mean that the taxpayer is ultimately responsible? It was bad enough to have allowed Ray Burke and his ilk to sign over national assets to foreign based multi-national companies for nothing. It would be preposterous to have to end up bankrolling another multi-national for mistakes carried out by a state sponsored company. Will we ever learn?

INTERNATIONAL POLITICS

WITHOUT even getting into the history of Shell and the Ogoni people in Nigeria and the subsequent deaths of several people, the next round of responsibility falls to various state agencies after auditors KPMG refused to sign off on the Royal Dutch Shell accounts. KPMG is worried about "the quality of information" it had received. KPMG also has responsibilities as an auditing company. The Securities and Exchange Commission (USA) is investigating Shell's conduct in the "reserves' affair. Three countries – Britain, Holland and America – are now carrying out formal investigations into the way Shell carries out its business. The American Justice Department is also carrying out an investigation. There is talk of class actions by shareholders in America. One source claimed that the actions for damages could be "billions of dollars." The Dutch investigation centres on charges of insider trading. It has also emerged that the Dutch royal family has lost a few bob since Shell's share price came tumbling down'– over €370 million at the last count. It has plummeted from 640p in 2001 to 320p this year. The worst may not be over yet. The source of the problem is understood to be Nigeria although Shell claims it is a field in Norway where oil stocks were over-estimated. Nigeria offers a generous tax concession to exploration companies based on the amount of their stated reserves in the country. The higher your reserves the better your tax concession. Someone in Shell overstated the Nigerian reserves. Now all the authorities are looking for a slice of the action to ensure that (another) multi-national scandal is cleaned up in the wake of Enron and Parmalat.

SHELL RESERVATIONS

THERE are a few significant dates lighting up the Shell calendar for the next few months. The one shareholders fear is that any day there could be an announcement of further reclassifications of reserves. The accounts, due on March 19th with the annual report, have been deferred until the end of May. The annual general meeting of the group is due to take place next month but that too has been delayed. It is now expected on June 28th. The new chairman, Mr. Jeroen van der Veer, will earn his keep over the next few months if he wants to keep this company on the straight and narrow.

There are other dates of note to the company also. April 1st – April Fools' Day'– is the final date for submissions by the public on the further information in relation to the Corrib project. The due date for a decision on the project from Mayo County Council is May 8th. *The Guardian* newspaper recently reported that according to Mr. Fadel Gheit, oil analyst with Fahnestock and Co brokerage in New York, "It's become another day, another crisis with Shell. There are only so many surprises that investors will take and yet management (of the company) still seem in denial." A complete study of all Shell's reserves is being undertaken by Ryder Scott, an American consultant. This study is to be carried out with the guidelines of the Securities and Exchange Commission's guidelines in mind. He has not completed his task as of yet. The end of April is the date set for the completion of the reserves update. One wonders will we get an accurate picture of the reserves of gas in the Corrib field. Shell appears to have taken the 'reserves' details relating to the Corrib off its website. Shell has also announced the sale of its gas network in Mexico. If Shell off-loads Corrib, which is a possibility, here's hoping that the new buyer will develop the Corrib gas field offshore.

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March 21, 2004

Why we still can't be sure of Shell

A shake-up has been launched after the oil giant downgraded its reserves for a second time. Lucinda Kemeny reports

MALCOLM BRINDED certainly knows how to keep calm in a crisis. As the recently crowned head of Exploration & Production (E&P) at Royal Dutch/Shell, the British engineer clearly has faith in his ability to handle an audience.

Even with the constraints of working for a company that verges on the paranoid in its dealings with the outside world, last Thursday's gathering on the 23rd floor of Shell Centre let Brinded show off in the way that he obviously loves.

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Forty journalists and analysts packed the meeting room and another 350 listened in on a conference call as Shell called a meeting to elaborate on yet another bombshell.

Yet despite the fact that Brinded and his new boss Jeroen van der Veer are involved in a huge crisis, they both managed to crack a joke or two. "I hope that we don't lose a third head of E&P in short order," said Brinded.

Brinded's two predecessors in E&P have just lost their jobs. Sir Philip Watts and Walter van de Vijver were sacked two weeks ago after they lost the confidence of their boardroom colleagues. Watts had become chairman but he was damaged by his past responsibility for finding new reserves.

And that is not the only reason why the background to the meeting was anything but funny. A press release sent out just after midday confirmed that 470m barrels of oil would be wiped off Shell's proved oil reserves, on top of the 3.9 billion barrels that were recategorised from proved in January.

Not only that, but the 2003 results, which were due to be released last Friday, have been put back until the end of April while the annual meeting, scheduled for April, is now expected to be held on June 28.

One analyst said: "This is a company with good assets but a management team that does not know what it is doing."

The timing could hardly have been worse. Having sacked Watts and Van de Vijver, now should have been a time for rebuilding Shell's reputation.

Van der Veer and Brinded tried to stop people dwelling on the bad

SPRING IS IN THE AIR

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news with fighting talk. Van der Veer said: "We will be very sure that we will never drop this bomb again."

Both painted visions of a future Shell untainted by problems in replenishing its oil production and where a string of corporate-governance changes would make all the difference.

All would become clearer within weeks when Ryder Scott, a group of consultants that is reviewing Shell's entire oil portfolio, will complete its work, they assured.

Some analysts even left feeling upbeat. But Shell's share price told the real story. It ended the day down in both Britain and America, where an estimated $2.5 billion (£1.4 billion) was wiped off the company's market value.

With the Securities and Exchange Commission (SEC) and Justice Department in America, not to mention the Financial Services Authority in Britain and the Dutch regulator also raking over the coals, anything could happen.

One thing is almost certain, however. There will be more bad news, and when it comes, the question must surely be how long the Shell board can survive the shocks.

SHELL used to be known as the most conservative of oil companies. Inward-facing and consensus-driven, a plethora of management committees grew up — and they made sure everything was done by the book.

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But in the mid-1990s something went wrong. Shell stopped being as successful at finding oil and gas. It was exploring too many sites, many of which were too small to be meaningful to the balance sheet.

This scattergun approach had got BP into trouble a few years earlier, but instead of a strong leader like Lord Browne arriving and scrapping the loss leaders, Shell carried on, wasting time while its rivals took the lead.

According to internal documents leaked to the media, Shell executives studied the problem and came up with a simple answer: relax the rules used to assess energy finds. This way it could overstate or prematurely book reserves as "proven", which the SEC defines as reserves that can be recovered with "reasonable certainty" through existing wells.

The structure of the business meant the change would have gone unnoticed by most staff unless they were directly involved. There was no standardisation of reserve bookings across the company, no regional challenging of reserves figures through the reporting system and limited use of external auditors specialising in the oil sector to support the numbers being produced.

Shell's management structure appeared to be so decentralised that business units seemed able to be run as mini-fiefdoms. This was particularly true of Exploration & Production.

January's reclassification of 20% of its oil and gas reserves was blamed in large part on overbooking in developments such as Nigeria and Ormen Lange, a gas field off the Norwegian coast.

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But it has since been revealed that management either tried to conceal the problem or failed to recognise that it was breaking SEC guidelines.

Documents uncovered by American newspapers allege that an internal study late last year revealed that 1.5 billion barrels or 60% of its Nigerian reserves did not meet SEC accounting standards as "proven". But these papers recommended that the details be kept secret for fear of damaging the company's relationship with the Nigerian government. It was decided that any reclassification should not be publicly identified with the country.

Shell may have had reasons other than politeness for keeping the details quiet.

The Nigerian government offered oil companies tax breaks from 1991 to 1999 for oil-reserve additions — or any oil reserves added over and above what they expected to find. Since Shell was one of the biggest explorers in the region, it accumulated about $385m in so-called "bonus payments". Shell is now in talks with the government over the money.

This is not only highly embarrassing but comes at a time when Nigeria wants to increase production, and this could severely strain Shell's relationship with a country that has been largely untapped in oil terms.

Ormen Lange is no less worrying. Having already contributed to the downgrade in January, Thursday's announcement was driven by yet more problems being uncovered there.

Brinded explained that a review of compliance with SEC rules by Ryder Scott had revealed that Shell had used technology, including 3-D seismic mapping, to determine the volumes of reserves in some areas, most notably in Norway.

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"While useful, this is not in accordance with SEC guidance and it should not have happened given the attention that this field had received," he said.

While the impact on earnings is minimal — at about $20m, Ryder Scott has analysed only 40% of the company's reserves and more bad news could be on the way. Fadel Gheit, an oil analyst with Oppenheimer in New York, said: "It will be like a slow haemorrhaging."

THE question is, did management knowingly cover up the scandal? Internal papers suggest that at least Van der Veer and Judy Boynton, the finance director, knew of the depth of the problem.

But Van der Veer was adamant that he did not. "I knew we were low on reserve replacement. That is not the point. The underlying question is did I know about incorrect bookings in SEC returns? The answer is that I did not," he said.

He insisted that the matter of reserves, which can be booked under many categories, is not a precise science and that the company was in regular contact with the SEC over what he termed "exposures", which was left to the Exploration & Production people.

"You know as a director that there are reserve figures and there are

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processes going on around that. But (although) we have a committee of directors, that does not mean that every director is doing everything. Reserves are seen as something for E&P to manage," he said.

One analyst responded that it was "staggering" that Van der Veer, in his role as head of the chemicals business and therefore a key member of the executive team, appeared to say he had no idea about how the reserves were being booked.

But whether he knows or not, the regulators and American lawyers preparing class-action lawsuits intend to find out.

The SEC started its own inquiry weeks ago and the Justice Department has also begun a probe of whether Shell misled the market. This could expose Shell to criminal charges.

The Financial Services Authority and Euronext, which has the Amsterdam Stock Exchange as a member, are also in correspondence with the company.

Van der Veer denied any knowledge of a criminal probe on Thursday, but the company has admitted that the AFM, the financial regulatory body in the Netherlands, has opened an investigation about potential insider trading. One oil specialist said: "The non-executive directors are freaking out."

FOR NOW, investors and shareholders are still prepared to offer the company some benefit of the doubt. They understand that last week's announcement was coupled with a raft of corporate-governance improvements, including clearer reporting lines direct to Boynton and that the committee of managing directors, the highest executive group within the company, is to sign off reserves each year.

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They are also aware that Ryder Scott and the company's own staff are labouring round the clock to make sure that there are no more skeletons in the cupboard.

Tim Rees of Insight, one of Shell's biggest shareholders, said: "Analysts and investors were completely wrong-footed on Thursday, and there is even less love for the company as a result. But this is unsurprising. Shell needs to be ultra-conservative and publicly transparent about what it finds."

But shareholders want more. They are meeting Lord Oxburgh, Shell's non-executive chairman, tomorrow to demand headhunters be appointed to find an outsider to run the company.

Van der Veer may have done some tinkering, but they want more, and while Shell has said publicly that no wholesale changes will be decided before next year, that may be too late.

Only one thing is certain. Shell's top executives will need all the sophistication and humour they can find to keep the audience happy.

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THE NOTAB SONG.

Enterprise Oil has come calling to make landfall at Ballinaboy,
It's handy for them to save millions; for us it's a cynical ploy.
There's been farming and fishing in Erris for five thousand years or more,
Are we now to allow the free market to dirty and damage our shores?

Chorus

Oh! here's to the people of Erris,
We've clean water, clean air and clean soil.
We've known hard times and forced emigration,
We'll get by without Enterprise Oil.
(And Royal Dutch Shell as well!)

We've been here on the north coast of Mayo forgotten for many's the year
A large blank space in the budgets of Tourism, Trade and Marine.
Now all of a sudden it's changing, but not for the good of our own -
A dirty great Terminal Building they thought we'd accept lying down.

Chorus

We've never been bought by outsiders and we aren't for sale to them now;
We've been here in this corner for ages and we've got things that money can't own.
Our forebears marched down to Killala to fight against tyranny then -
Do you think that we're now going to lie down, sell our children's future from them.

Chorus

Our oil and our gas rights are ceded for a fraction of what they are worth,
While the old lie on hospital trolleys and the poor are forgotten or mocked.
The wealth which is ours is extracted and sold back at the full market rate -
Are we still a proud sovereign nation or a sordid brown envelope state?

Chorus

AIR: FIR AN IARTHAIR/MEN OF THE WEST.

NOTAB - NO TERMINAL AT BALLINABOY!

MH-2001

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OUR REF: 04-025-040-23-02

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23th April 2004

Brian Coyle
Block 1, 2nd Floor
GFSC
Moneenageisha Rd
Galway

Mr. John Colreavy
Health & Safety Authority
10 Hogan Place,
Dublin 2,
Ireland.

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Re: Gas Terminal, Co. Mayo
Planning Reference Number 03/3343

Dear. John

I would like to inform you that in a report titled "Decommissioning of the proposed Bellanaboy Bridge Terminal —John Downey— Corrib Subsurface Manager" it states that "it is highly probable that any further gas discoveries in the Slyne / Erris Basin would be produced via the proposed Bellanaboy Terminal subject to the receipt of the necessary consents and approvals".
This statement suggests that other gas finds can be processed at this terminal; as other gas finds can/could contain higher concentrations of Hydrogen Sulphide and since this is a very toxic substance and can kill at concentrations even as low as 0.1-0.5% therefore I would like to commission you and/or National Authority of Occupational Safety and Health to examine the consequences of treating sour gas at this proposed terminal site.

We are all too familiar with the failure of pipelines. The proposed high-pressure upstream and down stream pipeline with transport untreated and treated gas respectively through various soil types. Therefore, I would also like to commission you and/or National Authority of Occupational Safety and Health to examine the consequences of such and event. The health and safety of people at work in close proximity to the pipeline should also be considered. The proposed setback distance of 70m is for the safety of the pipeline from surrounding activities and does not include for the safety of the public.

A clear understanding of the terminology used is very important e.g. "Dry Gas" "Wet Gas" "Sweet Gas" and "Sour Gas".

Please outline your proposals, commitment, and fee for this assignment.

Yours Sincerely

Brian Coyle BE, CEng, MIEI, MIStructE
Chartered Engineer

cc Ian Douglas- Mayo County Council

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Gortacragher
Rossport
Ballina
Co. Mayo

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1st April 2004

Mr Ian Douglas S.E.P.
The Planning Section
Mayo County Council
The Mall
Castlebar
Co. Mayo

SCANNED

Re : Planning Application Ref No P03/3343 as submitted by Shell E & P Ireland Ltd.

Dear Mr Douglas,

This is a submission based on planning application P03/3343 and the information submitted by the developer to Mayo County Council on 11th March 2004 in response to a request by Mayo County Council for further information on 17th February 2004.

We refer to the above and wish to make a number of observations.

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Volume 1 ; Item 2 - "Written confirmation from the relevant regulatory authority that the design of the proposed gas pipelines from the Terminal compound to the site boundary is suitable to ensure the structural stability of the pipelines constructed in deep peat soil".

The Seveso II Directive applies to the transport of dangerous substances in pipelines inside the refinery establishment(s) therefore the upstream pipeline containing raw inpure wet gas at elevated pressure(s), the control umbilical and discharge pipeline etc. are within the remit of the Directive and thus safety aspects with respect to this reality have not been taken into account by Mayo County Council and The Health and Safety Authority. At the last oral hearing conducted by An Bord Pleanála in November 02 the N.A.O.S.H. report prepared by Mr John Colreavy stated on page 5 that "The Directive does not apply to pipelines or the road transport of dangerous goods outside the boundary of the establishment". He did not fully assess the health and safety implications in relation to the upstream pipeline section within the boundary as was his remit and what was assessed was based on dry not wet gas. In reality as the term "establishment" refers to the whole area under the control of an operator and as the Corrib Field(s) is to be controlled and operated by Shell E&P (as operator) and partners etc. this upstream section of pipeline from the landfall to the proposed terminal (refinery) should fall within the establishment. Please refer to Appendix A whereby Ms Breda Gannon S.E.P. stated on 6/8/02 that " . . all information received with respect to the gas terminal and upstream pipe forms part of the application for planning permission". Mr Colreavy did not address the impact of gas explosions precipitating landslides in his assessment. After the Dooncarton landslides on 19/09/03 this is a very real issue.

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e refer to a request for "written confirmation from the relevant regulatory authority" and response by the developer as follows : "The import pipeline is to be constructed in accordance with the consent obtained by Shell on 15th April 2002 from the Department of the Marine and Natural Resources persuant to Section 40 of the Gas Act 1976. , A copy of the consent is provided. This consent is subject to technical and environmental conditions with which Shell is obliged to comply". It is unclear from the letter of the 15/04/02 to Mr Brian Ó Catháin, Managing Director, EEI Ltd. Corrib House, 52 Lower Leeson Street, Dublin 2 by Frank Fahey T.D. (Minister for the Marine and Natural Resources) as to whether this is the actual consent to construct the upstream pipeline, as it states the following "I will be grateful if you would acknowledge and indicate your acceptance of the above conditions". There is no response from Mr Brian Ó Catháin on record to indicate that he accepted the conditions referred to and therefore how can we accept that this is the actual consent.

We believe that Technical Condition 2 ("the pipeline route is to be fixed near inhabited buildings to ensure that a minimum proximity distance of 70 metres is achieved") cannot be complied with because there are a number of inhabited houses within the 70 metre zone along the upstream route.

Referring to Technical Condition 22 we quote the following "Duration, likely frequency and noise associated with flaring of both the HP and LP flares should be kept to a minimum in accordance with best industrial practice". The Department of the Marine and Natural Resources has no jurisdiction over the proposed terminal (refinery) and their jurisdiction over the upstream pipeline(s) is highly questionable. Will flaring be in operation to reduce the wellhead pressure of 345 BARG to 150 BARG in increments along the upstream route from the landfall to the terminal (refinery)? If so these "flares" will require planning permission as well as other ancillary equipment such as a proposed "single in-line joint / termination unit" to be located on our private lands (refer to Ballinaboy Bridge Terminal EIS P00/2934 under 5. Alternatives p 5-9) and valve station at the Dooncarton landfall. We refer you to Appendix B (Bord Gáis Mayo-Galway Gas Pipeline EIS Non Technical Summary dated May 2001 by ARUP). On page 3 the following is stated "Gas pipelines do not require planning permission. However any above ground installations, other marker posts, such as block valve stations require planning permission from the relevant Local Authority". Therefore the upstream associated infrastructure would require planning permission. We also refer you to Andrew Johnston's report (commissioned by the Department of the Marine and Natural Resources) page 21 under the title summary "in-ground utility crossing and associated above ground installations".

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We refer you to Appendix C whereby the onshore line is set at 345 BARG (pipeline specification 344 BARG) and the onshore Terminal (refinery) is set at 150 BARG at the pipeline. This would strongly indicate that depressurisation by some means such as flaring along the proposed upstream route would have to occur to have an arrival pressure at the proposed Terminal (refinery) of 150 BARG. This projected reality is unprecedented in the world and poses an unacceptable risk to human and animal health and wellbeing.

What regulatory authority will mitigate against the effects of the proposed blasting on adjoining residential properties and on Dooncarton mountain?

We refer you to Appendix D - A critique of the operational methodology and process components at the proposed Ballinaboy Bridge Gas Terminal, County Mayo, Eire by Mr Peter Rossington

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Sc (Hons) M.R.S.C. He states on page 3 "The EIA admits that around year nine of the proposed plant's twenty year lifespan mechanical refrigeration will have to be installed . . . . For anybody not familiar with gas processing, the installation of a major chilling plant is not a simple operation. Major construction will be required at the Terminal in year nine, the extent of which will nearly equal the major construction currently proposed. This construction will once again result in large scale disruption to the life of local residents. If it is taken into account that mechanical refrigeration is a more efficient processing technique than adiabatic expansion, it will be required in year nine of the terminal's life anyway and local residents should be inconvenienced as little as possible by the proposed terminal, then Enterprise Oil should incorporate mechanical chilling into the current design of the Terminal" Also on page 3 he states the following "The EIA makes reference to the use of propane as the refrigerant medium in the proposed mechanical chilling system to be installed in year nine. Whether a refrigerant system is installed either in year nine, or at the beginning when it should be present, it is surprising to see that propane is being considered as the chilling medium. Propane is a highly flammable gas that by its presence alone causes increased risk for local residents and terminal operators alike . . ."

This development is not in compliance with Seveso II Directive (Mechanical Refrigeration implications and the use of propane have not been addressed) with respect to health and safety criteria whereby the developer must supply and include all the types and cumulative quantities of the anticipated products / byproducts used in the gas processing industry. Therefore the legal requirement which must be implemented as a result of Seveso II is that technical advice on the risk arising from the establishment must be available when planning decisions are made.

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As this mechanical refrigeration unit will require major construction this will also involve the removal of colossal amounts of peat and dóib with associated siltation and other negatives such as disruption to local residents, effects on the roads structure etc. Where will this displaced peat and dóib be removed to? This development will also present problems from a visual point of view with the further removal of trees due to the health and safety criteria and also the interaction of other chemical processes on site. According to the Seveso Directive these and other questions must be addressed NOW.

We refer you to a report "Corrib Gas Pipeline Project - Report on Evaluation of Onshore Pipeline Design Code", prepared by Andrew Johnston dated 28th March 2002, submitted to the Department of the Marine and Natural Resources for assessment re. the upstream pipeline and quote the following from page 11 under the heading 4.2 Key Aspects of the Corrib Gas Pipeline.
" The circumstances include the fact that the pipeline has an unusually high design pressure and transports unprocessed wellfluid, which is a WET GAS and therefore corrosive when combined with carbon dioxide (CO_2) in the gas". The Health and Safety Authority derived their conclusions with respect to its modelling assessments re. potential impacts based on DRY GAS. Wet gas usually contains hydrogen sulphide which is corrosive. Therefore it is our considered opinion that the planning application would need to be modified to reflect this reality. This report is damning with respect to the upstream section and we urge you to study it carefully. (Appendix E)

We refer you to the proposal to route a large section of the upstream pipeline and misc. through our private lands. This proposed pipeline has three 90 degree turns along this section of the route (Appendix F). This is unprecedented for highly pressurised gas, as explained previously. There is

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mention of the matter of the change of use of this property i.e. from agricultural to commercial use. We have been issued with documentation in relation to compulsory acquisition without any authority and we question the legality of these documents. It would appear that compulsory acquisition powers were not transferred to Mr Frank Fahey (Marine Minister) under the Gas Act 1976 as amended and Mayo County Council would need to seek legal advice on this issue. There is little point in assessing a proposal for a Terminal (refinery) if there is no feeder supply into it from source. The compensatory terms are completely inadequate given the nature of this proposed development.

With reference to Volume 1 ; Item 6 "Phosphate Hotspots" Independent assessment would need to be conducted to verify the readings submitted. Phosphate could leach from the peat in transit to Srahmore. The information provided by the developer in relation to phosphate hotspots is not complete and does not take account of the mechanical refrigeration unit referred to earlier.

In our previous submission re. P03/3343 (dated 28/01/04) we referred you to "the risk to human health with respect to contaminated buried carcasses on the Ballinaboy site, an issue which was raised at the oral hearing into the proposed gas terminal (refinery) at Ballinaboy and which is referred to in the Terminal EIS Volume 1, 8.4.6." This matter will also apply to the area for the proposed mechanical refrigeration chiller.

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With respect to Volume 1 ; Item 20 the Point-of-Ayr gas terminal is located on the shoreline with a flare stack in isolation and with no forest plantation in the vicinity. How can this be compared to the current proposal for Ballinaboy which is surrounded by mature coniferous forest (a potential fire hazard). In the Point-of-Ayr the terminal' s location is highly significant as the incoming gas is depressurised and received on the shoreline for processing. In Ballinaboy however the proposal is to allow highly pressurised gas and misc. to traverse inland for a distance of nine kilometres through residential areas, again unprecedented. Please refer to Appendix G where it is stated that "The Point-of-Ayr was developed at a cost of £1.1 billion (sterling) and employs approximately 550 people and contributes an estimated £15 million in goods and services into the local economy each year. The Point-of-Ayr Terminal was built in 1995 . . . ." The proposed Ballinaboy Terminal is to cost in the region of 150 million euro which alone reflects the inadequacy of this proposal, utilising some of the worst gas terminal design that maximises emissions, minimises energy efficiency and maximises disturbances in the area - for an estimated 15 to 20 years supply of gas!!!

We have real concerns with respect to copious, miscellaneous emissions into the air which will be directed by the prevailing south westerly winds directly towards our village in Gortacragher. The upstream pipeline has been described in the An Bord Pleanála report on page 76 by Mr David Taylor, on behalf of the proposer, as "it is the only one of a kind that he is aware of". Is is any wonder then that no competent or regulatory authority has taken responsibility for it which puts the whole concept into perspective. It creates a health and safety hazard which has not existed previously. We, as residents along the pipeline route, are sandwiched between the highly pressurised incoming gas and the proposed Terminal (refinery) at Ballinaboy. Because of this reality our private lands and residental properties will be totally devalued by this development as it is non sustainable.

Having perused the response to further information we have come to the conclusion that the

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Information provided by the developer is incomplete and inadequate. We have made our concerns known to Mayo County Council in previous submissions which were later vindicated by An Bord Pleanála. The latest application P03/3343 is flawed in the extreme from a planning, engineering, health and safety, environmental and academic perspective. We believe that Mayo Council Council have no option but to refuse planning permission for what is a concept and unprecedented.

Yours sincerely

Bríd Mc Garry.
Bríd Mc Garry B. Agr. Sc. (Food Science and Chemistry)

Teresa mc Garry
Teresa Mc Garry

Encs.

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Appendix A

COMHAIRLE CONTAE MHAIGH EO

MAYO COUNTY COUNCIL

MEMORANDUM

TO:	Mr R. Norton, Director of Services Mr P. Hynes, Director of Services Mr S. Granahan, Director of Services Mr J. Beirne, Director of Services/County Engineer Mr I. Douglas, Senior Planner Ms B. Gannon, S.E.P., Planning Section
FROM:	Mr J. Walsh, A.O., Corporate Affairs
DATE:	25th July, 2002
SUBJECT:	FREEDOM OF INFORMATION REQUEST - FOI 287

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Attached please find copy of request for information under the Freedom of Information Act, 1997, received from William Fry, Solicitors, Fitzwilton House, Wilton Place, Dublin 2.

The Freedom of Information Act refers to records created on or after 21st October, 1998.

I would be grateful if you could provide a report on the records as requested to the undersigned not later than Wednesday, 7th August, 2002.

Thanking you.

J. Walsh

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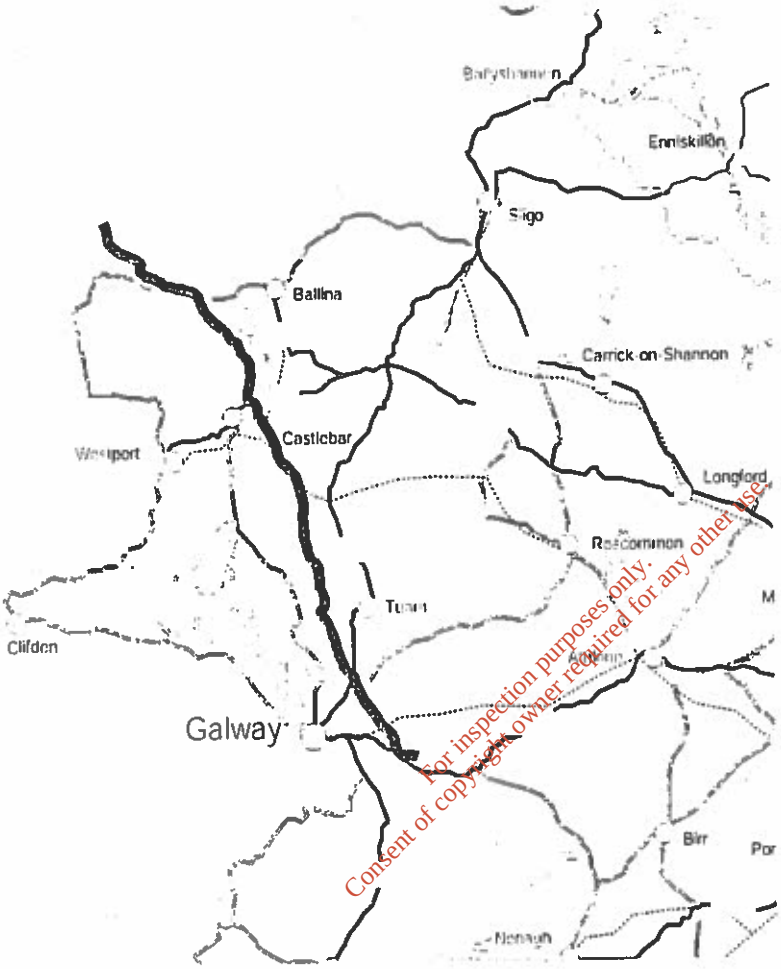
S.50 Please respond - all information received with respect to the gas terminal & upstream pipe forms part of the application for planning permission [illegible] available for inspection during office hours

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Appendix B

BORD GÁIS
TRANSMISSION BUSINESS UNIT

MAYO-GALWAY GAS PIPE LINE



ENVIRONMENTAL IMPACT STATEMENT

Non-Technical Summary

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2 Environmental Impact Assessment

BGE must obtain the consent of the Minister for Public Enterprise to construct and operate a gas pipeline. For gas pipelines greater than a certain size and length BGE must submit an EIS to the Minister to accompany the application for consent. The Minister may attach conditions to his approval.

Gas pipelines do not require planning permission. However any above ground installations, other marker posts, such as block valve stations require planning permission from the relevant Local Authority.

The EIS has been prepared in accordance with the requirements of the European Communities Environmental Impact Assessment (Amendment) Regulations 1999, which specify the projects requiring an EIS and the information to be provided.

The principal elements of the environmental assessment process, up to submission of the EIS, which were followed during this environmental impact study, are described below:

Scoping - determining the issues to be part of the study, including further issues identified by Consultees, and the availability of data

Determination of baseline conditions - determining the criteria with reference to which the likely environmental effects of the proposed development were to be evaluated

Consultation - undertaken throughout the assessment process in order to inform interested parties and invite comment

Evaluation of significant effects/determine mitigation - an iterative process whereby the significance of potential effects is determined and design improvements or appropriate mitigation identified in order to reduce adverse effects

Determination of significant environmental effects - once mitigation/design improvements have been incorporated, the significance of residual environmental effects was determined

Reporting - the findings of the assessment are reported in an EIS, which is a public document

Consultation

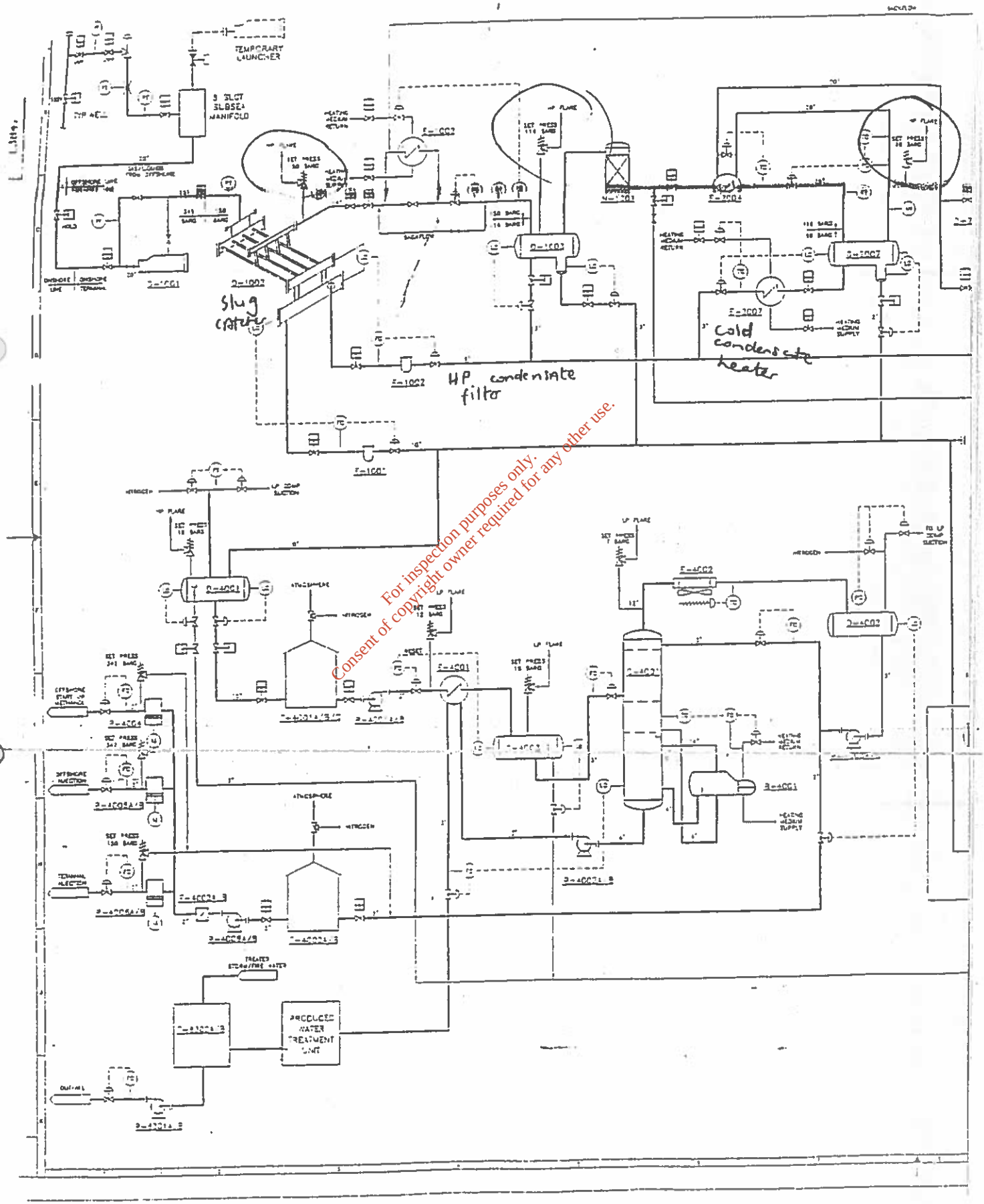
Consultation is a very important part of the environmental assessment process. Consultations took place with government departments and other agencies during the environmental assessment. The main organisations contacted were:

- Dúchas (Parks and Wildlife Section)
- Birdwatch Ireland
- Irish Peatland Conservation Council
- Department of Zoology, TCD
- Dúchas (Research, Bogs and Wetlands)

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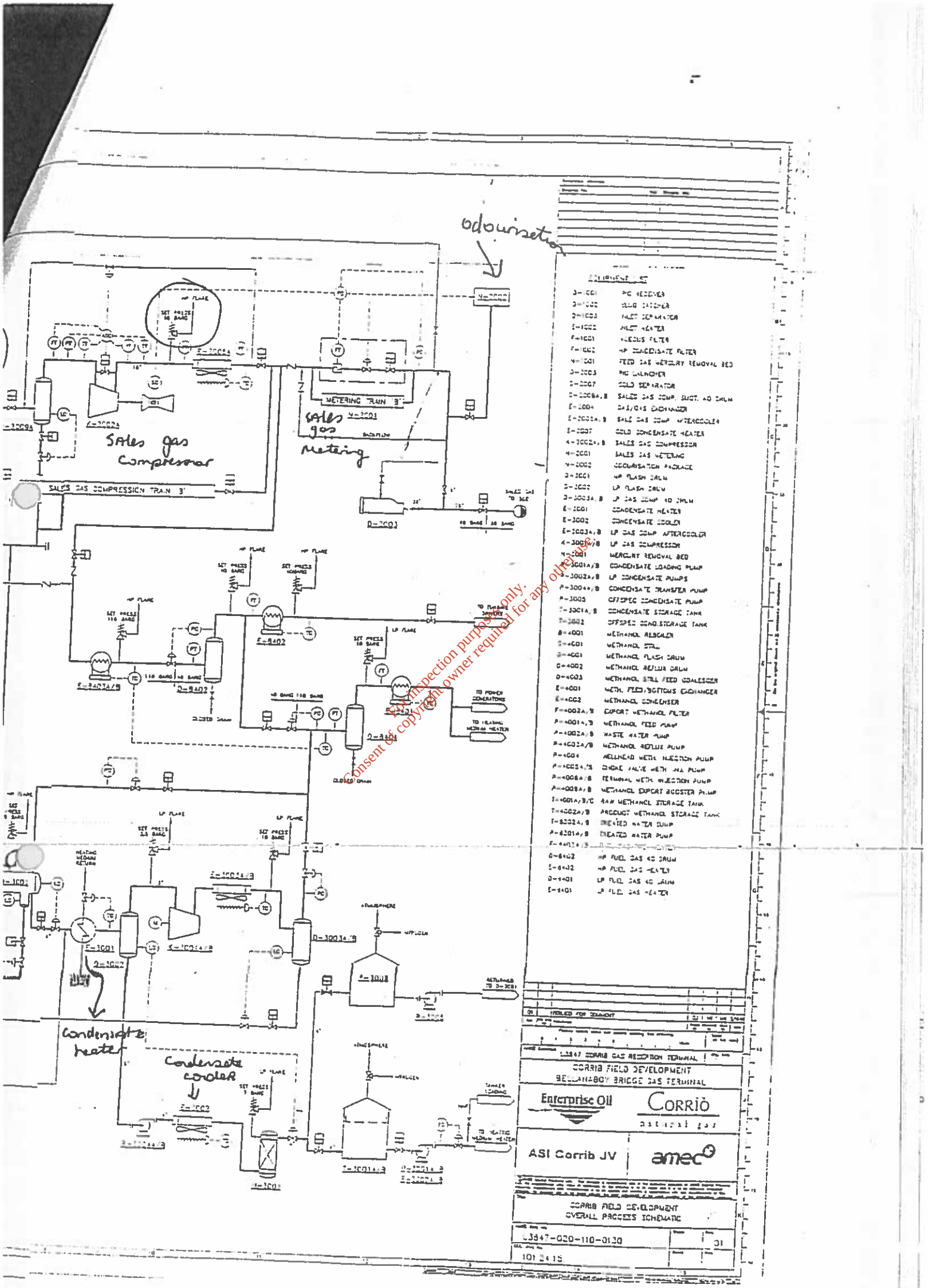
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Appendix C



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Appendix D

A CRITIQUE OF THE OPERATIONAL METHODOLOGY AND PROCESS COMPONENTS AT THE PROPOSED BELLANABOY BRIDGE GAS TERMINAL, COUNTY MAYO, EIRE.

BY PETER ROSSINGTON B.Sc. (Hons) M.R.S.C.

The benefits of using natural gas as a fuel for power generation in an expanding economy are well known. In fact, in section four of the Environmental Impact Assessment (EIA), for the proposed Bellanaboy Bridge gas terminal, they are even documented. It is stated that, "As the demand for energy increases, it is expected gas will have will have an increasing importance because of the efficiency of energy use in combined cycle gas turbine generators and the resulting relatively benign environmental impact of the emissions". From this statement, and other similar ones throughout the EIA, it is possible to think that Enterprise Oil and its partners understand the importance of energy efficiency and the need to keep toxic emissions to an absolute minimum. However, when the operational methodology and process components for the proposed terminal are studied, the impression is given that at their own facilities Enterprise Oil apply other principles. The proposed Bellanaboy Bridge terminal incorporates some the worst gas terminal design, that actually maximises emissions, minimises energy efficiency and, due to the need for residual construction throughout its lifespan, maximises disturbance for local residents.

Throughout the EIA, the impression is given that Enterprise Oil care greatly about the environment, but their words seem meaningless when the equipment specification is studied and the consequential emissions are considered. In most peoples minds, minimising the impact to the local environment means employing processes and equipment that produce the minimum emissions possible with current technology. However, minimising the impact on the local environment to Enterprise oil seems to mean, with a few exceptions, meeting current legislative requirements for emissions. Many local residents around the proposed terminal have realised the distinction between these two very different definitions given to the same term, and have consequently become very concerned about what this might mean for their health and local environment. This is very understandable when the history of industrial development, and its effects on the environment, is considered. For example, discharges of toxic metals from factories in both Europe and the United States for many years met the legislative requirements of various national governments until it was discovered huge areas of estuaries, rivers and lakes were highly polluted. A classic example of this was lake Michigan, which in the late 1970's was found to contain unacceptable levels of mercury and cadmium. The cause of the pollution was numerous plants discharging supposedly "safe" industrial effluent into the lake. Many of the plants responsible for the pollution were not fitted with technology that could have reduced the emissions of heavy metals to virtually nil, even though it was in existence and well proven.

To truly have a minimum impact on the environment, Governments and companies must adopt a target zero approach, and use technology and practices that minimise or completely stop toxic emissions and maximise energy efficiency. This is something Enterprise Oil has not done at the proposed Bellanaboy Bridge terminal.

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At the proposed Bellanaboy terminal sweet gas from the Corrib field will be processed to national transmission line standards by adiabatic expansion through a Joule-Thompson valve. The adiabatic expansion of the gas will cause cooling and consequently the drop out of water and hydrocarbon vapour in the gas, which in turn will give it an acceptable dew point for transmission. Whilst not requiring any energy inputs adiabatic expansion does result in a significant pressure reduction, which consequently results in the requirement for downstream compression of the gas to transmission line pressure. This compression does require energy input, and at the terminal it is proposed that this should come from a gas fired turbine compressor package that will be a large producer of nitrogen oxides and carbon monoxide.

At many gas terminals, adiabatic expansion is not the preferred method of cooling the gas for dew point control. Instead, the gas is fed through a series of heat exchangers, cooled on one side by a mechanical refrigeration unit that uses either propane or a HCFC refrigerant medium. This method does not result in a significant pressure drop in the gas pressure, and therefore, providing input pressure is above transmission line pressure, compression after treatment is not required. Mechanical refrigeration also requires the input of mechanical shaft energy and at many terminals this is supplied either by gas fired engines or turbines. These engines can also be large producers of nitrogen oxides and carbon monoxide. However, at smaller processing units, large electrical motors are sometimes used as the source of mechanical shaft energy. (An example of a plant that utilises this technology is the old Hamilton Brothers plant located within the Amoco complex at the Bacton terminal, Norfolk, United Kingdom. Two processing streams with a combined processing capability of 500 mmscfd operate of two large electrical motors powering two compressors using KLEA refrigerant.)

Adiabatic expansion is not the most suitable processing technology for the proposed terminal for two principle reasons :-

1. Emissions are maximised per unit of gas processed
2. Adiabatic expansion can not process gas for the proposed lifetime of the terminal

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Emissions are maximised per unit of gas processed because of two factors :-

a. Compression of natural gas is more energy intensive than refrigerant compression
b. Turbine driven machinery is only 30 - 35% efficient at converting fuel energy to mechanical shaft energy

The EIA states that a 7.7MW turbine is required for the compression of the gas after the Joule-Thompson valve, but if a mechanical chilling system was used, only a 2MW turbine would be required for processing the same amount of gas.[1] Assuming both turbines produce similar levels of emissions per megawatt generated, the higher energy input of the 7.7MW turbine would result in approximately three and a half times more emissions than the 2MW machine. Therefore, adiabatic processing is three and a half times more energy intensive, and polluting, than mechanical chilling.

Unfortunately, turbine driven machinery also suffers from the drawback that it is very inefficient, with only 30-35% of the input energy being converted to mechanical shaft energy. Electric motors are far more efficient at converting input energy into mechanical shaft energy, with efficiencies as high as 90%. Electric motors also have the advantage that they do not directly produce nitrogen oxides or carbon monoxide

[1] Figure taken from a 500 mmscfd plant using a Ruston TA1750 for mechanical refrigeration.

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Therefore, an electrically driven refrigerant compressor, if powered in a certain way, is far more advantageous for the environment and energy efficiency. (Electricity generation also results in emissions of nitrogen oxides and carbon monoxide, so it is possible to argue that using electrical motors does not really stop pollution. However, this point will be addressed later.)

The EIA admits that around year nine of the proposed plant's twenty year lifespan, mechanical refrigeration will have to be installed. The natural drop off in the inlet pressure, as the wells are used and become depleted, will result in insufficient adiabatic expansion and cooling to meet the dew point requirements. Therefore, mechanical refrigeration will have to be installed and used to ensure the export quality of the gas. For anybody not familiar with gas processing, the installation of a major chilling plant is not a simple operation. Major construction will be required at the terminal in year nine, the extent of which will nearly equal the major construction currently proposed. This construction will once again result in large scale disruption to the life of local residents. If it is taken into account that mechanical refrigeration is a more efficient processing technique than adiabatic expansion, it will be required in year nine of the terminals life anyway, and local residents should be inconvenienced as little as possible by the proposed terminal, then Enterprise Oil should incorporate mechanical chilling into the current design of the terminal.

Two further issues should also be considered about the gas processing, and they are :-

1. The type of refrigerant used in any mechanical chilling system
2. The need for the installation of the proposed gas compressors

The EIA makes reference to the use of propane as the refrigerant medium in the proposed mechanical chilling system to be installed in year nine. Whether, a refrigerant system is installed either in year nine, or at the beginning when it should be present, it is surprising to see that propane is being considered as the chilling medium. Propane is a highly flammable gas that by its presence alone causes increased risk for local residents and terminal operators alike. If Enterprise Oil truly wants to reduce the risks for their operations staff, and local residents, they should not select either propane or ammonia as the chilling medium. Instead, a modern HCFC stable refrigerant should be selected. While HCFC still poses a potential threat to the environment, through depleting the ozone layer if released, proper controls should ensure minimal refrigerant is released from the system.

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Whilst mechanical chilling is preferential to adiabatic expansion followed by gas compression, it is important to stress that it is the opinion of the author that the gas compression units still be completed in the original construction phase of the terminal. As the wells become depleted and the gas pressure falls it is likely that some compression will be required to meet the export pressure requirements. If the compressors are not installed in the original construction phase, this could again cause disruption for local residents at a later date when they are installed. As they will not be required in the initial stages of operation, if mechanical chilling is used, a set of bypass pipework will additionally be required. This however should not be difficult to incorporate in the design. It is important to stress that the compressors should be driven by electric motors, and not turbines as currently envisaged.

It is stated in the EIA that there is no external grid power for the site and therefore gas driven electrical generators are required. This is again an example of where Enterprise Oil could have chosen better equipment and have missed opportunities to minimise the impact of the proposed terminal on the environment.

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It is virtually acknowledged by everybody involved in fossil fuel generation that the only way to meet the requirements of the Kyoto protocol is to build more combined heat and power (CHP) plants that increase the efficiency of generation by utilising waste heat. As well as helping to meet the requirements of the Kyoto protocol these plants also offer the advantage of cutting the net toxic emissions from power plants. At the proposed Bellanaboy Bridge terminal, Enterprise Oil plan to generate electricity using gas fired compression engines that really do not allow for large scale utilisation of waste exhaust heat. In addition to selecting engines that do not allow for much utilisation, Enterprise Oil have also not incorporated any waste heat utilisation into their design.

Earlier in this critique it was argued that the main mechanical shaft energy requirements of the terminal should be met by electric motors, due to the efficiency of energy conversion and the fact that electric motors produce no direct pollution. Despite electric motors not producing any direct pollution, it must be acknowledged that electricity generation does result in the emission of nitrogen oxides, carbon monoxide and in some cases, depending on the fuel, particulate emissions as well. However, if the electrical power for the electrical motors is supplied by a CHP plant, the net toxic emissions for the terminal overall can be greatly reduced.

At the proposed terminal, a 15 MW base duty (43 MW net thermal input) gas fired turbine generator, with a waste heat boiler, should be part of the design. This would meet the electrical power requirements of the plant, both at the beginning and end of its life, and its thermal power requirements, but reduce the output of nitrogen oxides and carbon monoxide by as much as 82% and 97% respectively.[2] Modern gas turbines can be equipped with abatement technology to produce less than two and a half parts per million of nitrogen oxides and one hundred parts per billion carbon monoxide per cubic metre of exhaust gas. It is more than likely at the beginning of the proposed terminals life, 15 MW of electrical power will greatly exceed the power demand of the plant. Therefore, the terminal design should incorporate a power cable to the grid, and any excess power should be exported for sale. As the nearest grid point seems to be some miles away, this will increase capital cost, but this should not be used as a reason by Enterprise Oil to install the plant if they truly care about the environment and the effects of their operations on the local environment.

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The greatest advantage of a CHP plant would be that the proposed heating medium heater would not be required. It is stated by the EIA that the greatest impact on air quality will come from emissions of nitrogen oxides, and, whilst nitrogen oxides will be one of the major emissions from the proposed terminal, more toxic emissions that are likely to have a very negative impact on health should be of greater concern. It is proposed by Enterprise Oil that the heating medium heater should be fired on stabilised natural gas condensate from the Corrib field. This is very concerning because it is likely that the condensate will contain a number of toxic heavy metals that will be released into the environment when the condensate is burnt. The EIA gives no major details on the different heavy metals present in the condensate, apart from mercury, and therefore the likely emission rate of them. It admits that if the condensate is not treated emissions of mercury will be unacceptable, but only mentions treatment of the condensate for mercury. However, the type of treatment for mercury removal is not described. The EIA should give details on all the metals present and the likely emission rates, as well as the details of the proposed treatment system for metal removal.

Another undesirable consequence of using condensate as fuel, is emissions of all particulates will be higher than if the plant was fired on gas or not used because of the presence of a CHP plant. The EIA gives no details of what the likely ambient concentrations of particulate matter

[2] Based on the figures calculated in appendix 1 of this critique

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Appendix E

Corrib Gas Pipeline Project

Report on Evaluation of Onshore Pipeline Design Code

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Report prepared by:

Andrew Johnston

28 March 2002

28 March 2002

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Corrib Gas Pipeline Project

Report on Evaluation of Onshore Pipeline Design Code

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Corrib Gas Pipeline Project

Report on Evaluation of Onshore Pipeline Design Code

1.0 Introduction

Enterprise Energy Ireland Ltd is developing the Corrib Gas Field located approximately 65 km offshore from the County Mayo coastline. The gas is transported from the offshore facilities to the onshore terminal via a 91 km long 20" pipeline, 9 km of which is routed onshore from the landfall to the terminal.

The onshore section of the Corrib Gas Pipeline operates under certain conditions which are unusual, and consequently it is important that careful consideration is given to the selection of the pipeline design code, to ensure that the design takes into account best public safety considerations.

In order to investigate both the applicability of the selected design code, and how the Corrib Gas Pipeline design and operating conditions conform to the code requirements as well as internationally accepted design and construction techniques, this report presents the following:

- An evaluation of those codes which are relevant to the design of onshore gas pipelines, and
- An assessment of design and construction aspects which affect the integrity of the onshore pipeline section.

In doing this, the report identifies the following key aspects of pipeline design and construction which have particular relevance to the Corrib Gas Pipeline, and comments on how the design accommodates them, taking into account the specified code requirements:

- Design methodology
- Operating conditions
- Pipeline corrosion
- Public Safety
- Welding and testing
- Pipeline material quality
- Protection from interference

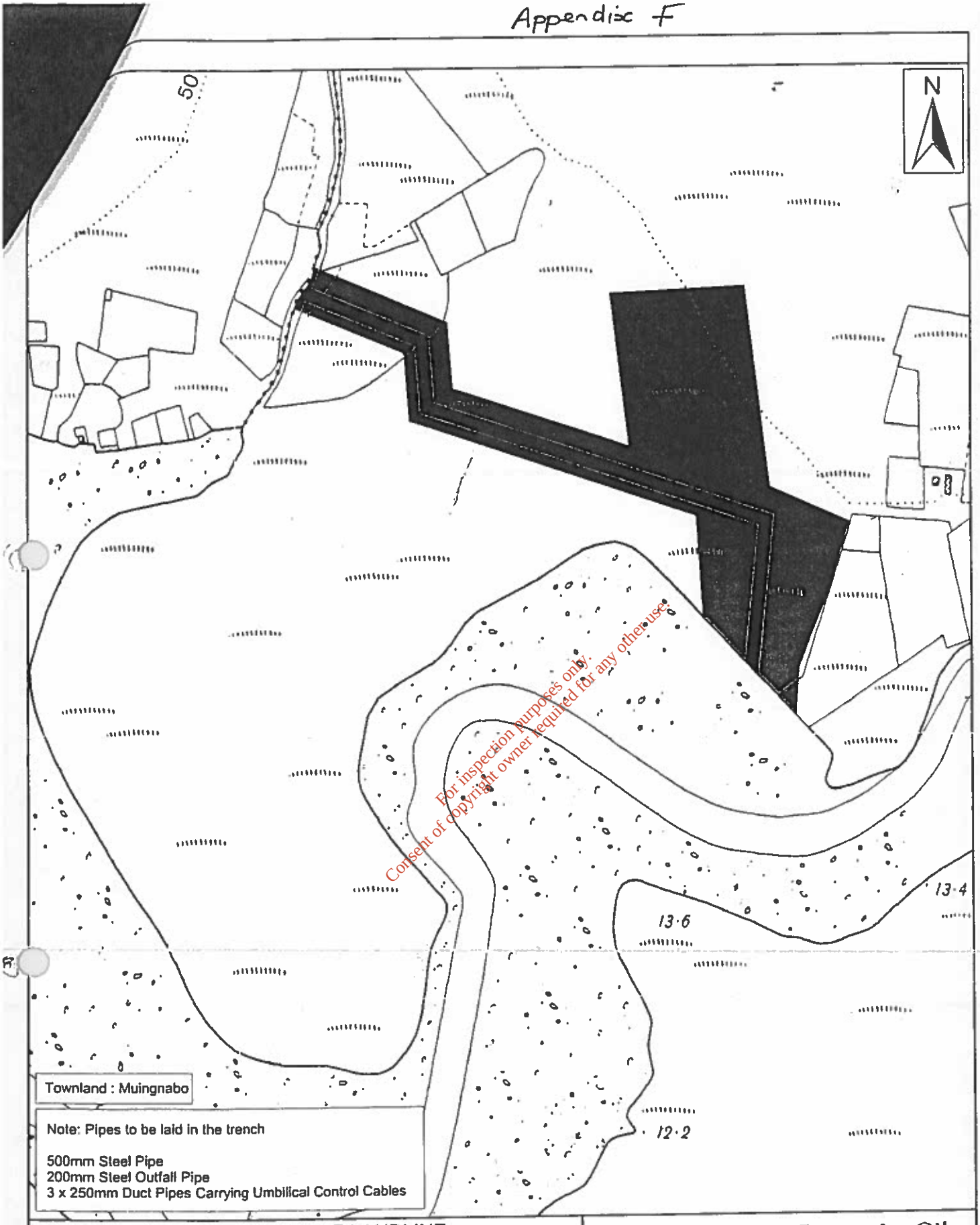
The report addresses the whole length of the onshore pipeline, from the landfall point to the terminal, including the two crossings of Sruwaddacon Bay, and the road crossings. The limits of the onshore pipeline are from the mean low water level to the first valve upstream of the pig receiver at the terminal and this section of pipeline includes a valve station near the landfall.

The report uses as a basis design documentation prepared by Enterprise Energy Ireland Ltd., J P Kenny Ltd. and Granherne/Allseas, and

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Appendix F



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Townland : Muingnabo

Note: Pipes to be laid in the trench

500mm Steel Pipe
200mm Steel Outfall Pipe
3 x 250mm Duct Pipes Carrying Umbilical Control Cables

PROJECT CORRIB - OFFSHORE LANDLINE

Owner/Reputed Owner (shown in yellow):

Name: Teresa McGarry
Address: Gortacrogher, Rossport, Ballina, County Mayo

Approximate Permanent Wayleave: Length	725m	Width 14m
Approximate Permanent Acquisition Area (shown in Red):	10150 sq m	
Approximate Deviation Area (shown in Green):	64107 sq m	
Approximate Total Area:	74257 sq m	

Ordnance Survey Reference No(s): 992-B

Corrib Field Development Project
Enterprise Energy Ireland Limited
Corrib House
52 Lower Leeson Street
Dublin 2

Enterprise Oil

Drawing Ref.: 22257/OD10/30660
Sheet 1 of 1

Drawing By: N Meadows

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Scale: 1:5000

Version: D

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Appendix G

industry into the area.

The recent report by the Western Development Commission has shown that the region has lagged behind the

whole of County Mayo and will create 130 jobs during construction and up to 60 direct and indirect jobs during operation.

supply of Irish goods and services which will arise from the development of the Corrib field.

CORRIB natural gas News Letter

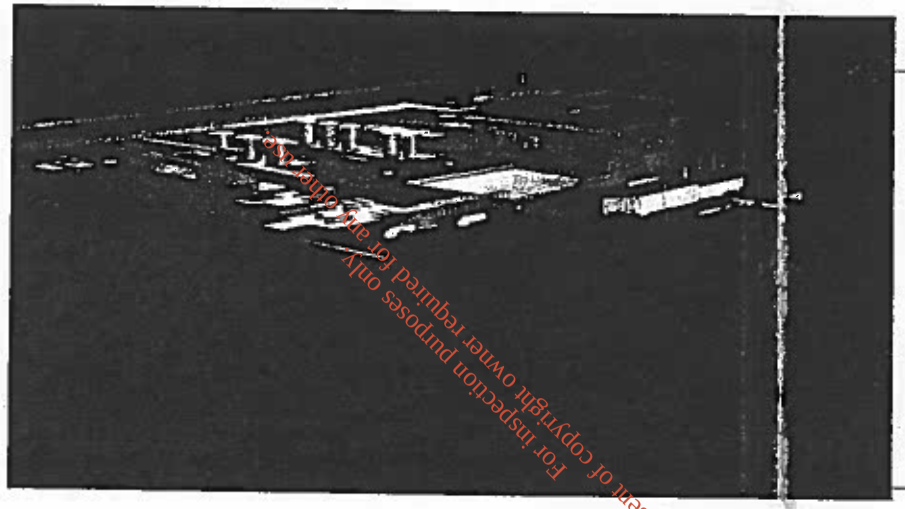
Issue 1 August 20

The Bellanaboy Facility

A dedicated team has been working on the development of the Bellanaboy facility to ensure top quality design and excellence in environmental standards, as well as compliance with the highest European standards of environmental protection.

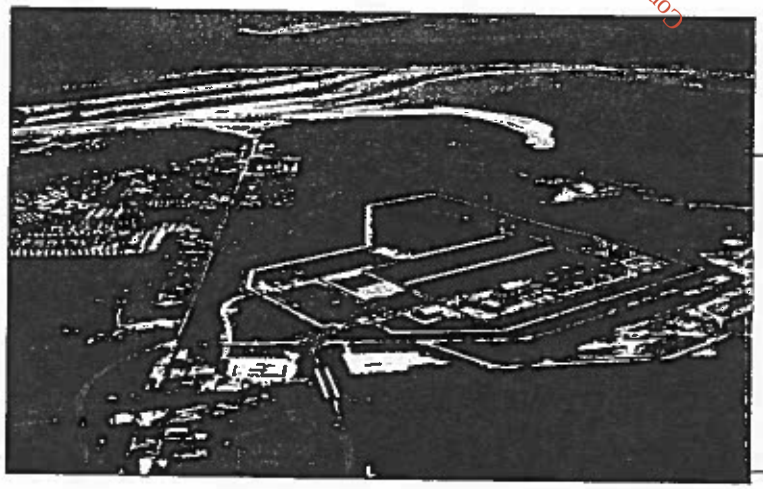
The facility will comprise a number of attractively designed low-rise buildings. These include administration, control room buildings, laboratory and power generating buildings as well as offices and a staff canteen.

The building finishes have been selected to merge with the local landscape in an attractive manner. The site, which was bought from Coillte, is well screened from adjacent roads by mature trees and it has been used over the years for research in improved crop productivity. For the most part, the facility will not be visible from the surrounding road network.



An architectural model of the proposed Onshore Gas facility, Bellanaboy, County Mayo.

The proposed Bellanaboy facility, which is subject to planning permission and Environmental Protection Agency licensing, is designed to world-class standards and will look broadly similar to the onshore Point-of-Ayr facility, North Wales. However, while the Point-of-Ayr facility is located close to the town of Talacre, as the photograph below shows, the Bellanaboy facility will be constructed within an existing forest and secluded behind a deep screen of trees around the site perimeters.



The Point-of-Ayr Onshore Gas Terminal - Broadly comparable in size and style to the proposed Bellanaboy facility.

Developed at a cost of £1.1 billion, the Point-of-Ayr Terminal employs approximately 550 people and contributes an estimated £15 million in goods and services into the local economy each year. The Point-of-Ayr Terminal built in 1995, has made a substantial contribution to attracting new industry into the region and is a source of considerable pride for the local community.

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Mayo County Council
Aras An Chontae
Castlebar

Ref No.: P03/3343

30/01/2004

Brid & Teresa McGarry
Gortacragher
Rossport
Ballina
Co. Mayo

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A Chara

I wish to acknowledge receipt of submission received from you on 28/01/2004 in connection with planning application by SHELL E & P IRELAND LIMITED for CONSTRUCT GAS TERMINAL FOR THE RECEPTION AND SERAPATION OF GAS FROM THE CORRIB GAS FIELD, AND FOR A PEAT DEPOSITION SITE, RESPECTIVELY. THE DEVELOPMENT WILL CONSIST OF THE CONCURRENT DEVELOPMENT OF TWO SITES LOCATED 11 KILOMETRES APART, APPROXIMATELY, AND IDENTIFIED AS THE SITE OF THE GAS TERMINAL FOR THE RECEPTION AND SEPARATION OF GAS FROM THE CORRIB GAS FIELD IN THE TOWNLAND OF BELLAGELLY SOUTH AND THE SITE OF THE PEAT DEPOSITION SITE IN THE TOWNLANDS OF SRAHMORE AND ATTAVALLY, BANGOR ERRIS. THE DEVELOPMENT AT THE BELLAGELLY SOUTH SITE WILL CONSIST OF: A GAS TERMINAL FOR THE RECEPTION AND SEPARATION OF GAS INCLUDING PLANT AND EQUIPMENT; PROVISION OF 4,935 SQ M (GROSS FLOOR AREA), APPROXIMATELY, OF BUILDINGS; ACCESS ROADS; 40 NO. CAR PARKING SPACES; AND ANCILLARY DEVELOPMENTS, OF WHICH 13 HA, APPROX, WILL BE DEVELOPED INRESPECT OF THE GAS TERMINAL'S FOOTPRINT. THE PROPOSED DEV. WILL OF THE BELLAGELLY SOUTH SITE WILL ALSO CONSIST OF; THE EXCAVATION AND REMOVAL OF 450,000 CUBIC M at BELLAGELLY SOUTH SRAHMORE ATTAVALLY.

The matters referred to by you will be taken into consideration by the Council before a decision is made on the application. Notice of the Council's decision on the

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application will be given in accordance with the requirements of the Planning and Development Regulations, 2001. This may be in the form of:

(a) posting the notice directly to you; or

(b) publishing the notice in a newspaper circulating in the area where the proposed development is situated.

Please note that in the event of an appeal being lodged by you, An Bord Pleanala will require a copy of this letter of acknowledgement.

Mise, le meas

RUNAI CHONDAE

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Ceathrú Thaidhg
Béal an Átha
Co. Mhaigh Eo

The Planning Section
Mayo County Council
The Mall
Castlebar
Co. Mayo

Re : Planning Application Ref No P03/3343 (as submitted by Shell E & P Ireland Ltd. on 17/12/03 and validated on 18/12/03) for the proposal to construct a natural gas terminal (refinery) at Ballinaboy, Bellagelly South, Co. Mayo. and to remove >450,000m3 liquid peat slurry to an area of cutaway peatland at Srahmore, near Bangor Erris, Co. Mayo.

Enclosures

One copy of submission on response by the developer Shell E & P Ireland to a request by Mayo County Council for further information (17 pages)

One copy of acknowledgement by Mayo County Council of receipt of submission dated 28/01/2004 .

Delivered by : Brid Mc Garry

Date : 01\04\04

Time : 12.20

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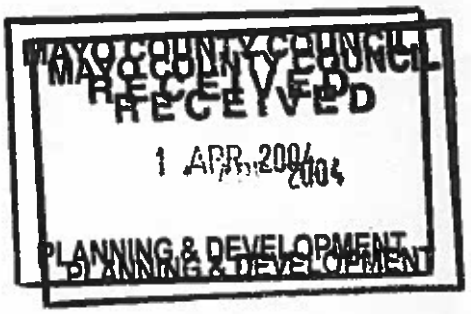
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Mayo County Council
Aras An Chontae
Castlebar

Ref No.: P03/3343

28/01/2004

Mr Michael O'Seighin & 5 Others
Carrowteige
Ballina
Co. Mayo



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A Chara

I wish to acknowledge receipt of submission received from you on 28/01/2004 in connection with planning application by **SHELL E & P IRELAND LIMITED for CONSTRUCT GAS TERMINAL FOR THE RECEPTION AND SERAPATION OF GAS FROM THE CORRIB GAS FIELD, AND FOR A PEAT DEPOSITION SITE, RESPECTIVELY. THE DEVELOPMENT WILL CONSIST OF THE CONCURRENT DEVELOPMENT OF TWO SITES LOCATED 11 KILOMETRES APART, APPROXIMATELY, AND IDENTIFIED AS THE SITE OF THE GAS TERMINAL FOR THE RECEPTION AND SEPARATION OF GAS FROM THE CORRIB GAS FIELD IN THE TOWNLAND OF BELLAGELLY SOUTH AND THE SITE OF THE PEAT DEPOSITION SITE IN THE TOWNLANDS OF SRAHMORE AND ATTAVALLY, BANGOR ERRIS. THE DEVELOPMENT AT THE BELLAGELLY SOUTH SITE WILL CONSIST OF: A GAS TERMINAL FOR THE RECEPTION AND SEPARATION OF GAS INCLUDING PLANT AND EQUIPMENT; PROVISION OF 4,935 SQ M (GROSS FLOOR AREA), APPROXIMATELY, OF BUILDINGS; ACCESS ROADS; 40 NO. CAR PARKING SPACES; AND ANCILLARY DEVELOPMENTS, OF WHICH 13 HA, APPROX, WILL BE DEVELOPED INRESPECT OF THE GAS TERMINAL'S FOOTPRINT. THE PROPOSED DEV. WILL OF THE BELLAGELLY SOUTH SITE WILL ALSO CONSIST OF; THE EXCAVATION AND REMOVAL OF 450,000 CUBIC M at BELLAGELLY SOUTH SRAHMORE ATTAVALLY.**

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Comments on Response by Shell to Request for Further Information on File N0. P03-3343, relating to proposed Ballinaboy Bridge Terminal and Related Srahmore Peat Dump.

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Submission: Micheál Ó Seighin and others.
Contact: Micheál Ó Seighin, Ceathrú Thaidhg, Bé[illegible] an Átha.
Contact Phone: 097/88961
Contact Ríomhphost: moseighin@eircom.net

Réamhfhocal:- Dáil Debates, 4/11/1998. Minister Dr. Woods:

"We will not grant a foreshore licence unless we are satisfied that there is planning permission."

Ach thit an spéir ar Acaill ó shoin.

Ongoing Development of Context:- We note that Mayo County Council did not inform the M.L.V.C., of their worries regarding the instability of Glengad Hill et alia, or of its' history of landslides. Mayo Co. Co. had so briefed the developer.

The M.L.V.C. is a committee of experts whose brief it is to recommend that the relevant Minister grant a Lease, Licence or Permission in matters marine, in this instance the go-ahead for the offshore and on-shore (8 Kilometres of pipeline and accessories) project.
"The M.L.V.C. will only consider and assess an application when it is fully satisfied that all relevant information is provided." (Marine Institute Documentation)

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We note also, that responsibility for matters above HWM lies with the Local Authority.

Transport Management Plan Item 1, Vol.1

This "plan" is in response to request No. 1 (Item No. 1). The preamble notes that it is a "living document", in other words a concept, not a proposal, and as far as its implementation goes, a blueprint for an ad hoc delivery of the required result. We do not believe that this is sufficient for a project of such magnitude where the risks are so great.

Overview:- Consideration does not include the disposal of excavated material from the 8 Kilometres of pipelines, from Glengad (Trá na n-Oistreach) to Ballinaboy. It is proposed to produce this waste to make way for a pipe of 500mm from the well, 3(I think) for the umbilical, and the outlet pipe taking waste water and its' passengers out to Erris Head. As well as the pipes themselves it is proposed to import some 50,000 cubic metres of fill (stones etc) presumably along the roads from Glenamoy to Rosport (Léana Mhianaigh / Seanmhachaire) and from somewhere to Glengad to replace the excavated material over 1 kilometre from Trá na nOistreach to Rosport. This necessitates the disposal of huge amounts of waste peat and soil, on the sloping land stretching along Sruth Mhada Conn, an SPA, and on a macaire etc. Or is it intended to be left where the

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JCB dumps it, on the 40 metre wayleave that Shell intends to obtain? I wonder will some of it wash off, given that over large sections of the pipeline it is intended to place it in up to 6 metres of bog?

1.4 Distinct Material Flows: Tobins mention this requirement at the top of page 3 (is that funny?) but does not further expand on it, despite a reference in 1.4 (f). Are the "*pipeline materials, trenching lining and wayleave stoning materials for the landward section of the gas pipeline from the foreshore to the terminal*" to be delivered along the 40 metre wayleave, and is this the escape route for the excavated material also? This traffic management plan is not complete and is an effort to deceive Mayo Co. Co. . In its potential for damage, immediate and irreparable, this 8 Kilometres, including a section within the terminal site, provides the "*main material movement*" and not the removal of the peat waste from the terminal site itself. Daft. What else has been forgotten, after 10 bites at the cherry?

(i) We do not see to where and by what route "*unsuitable material*" is to be hauled offsite, and what are the implications of this for the TMP. We presume that the dumping of such waste will only be allowed on a suitably licensed site, holding full and contemporary planning permission, delivered by a safe and stable route.

Altogether, 11 distinct sources of HVT are named here by Tobins, but there are of course more equally relevant sources than that.

3.1 Existing Traffic: L1204 caters also for all hospital generated traffic for the entire Dún Chaocháin area, for most of Dún Ciortáin and for areas around Glenamoy. We would call to mind the fuss generated in other areas where patients are not up to 70 miles from emergency treatment under normal living conditions when any obstacle is placed between the patient and hospital care. This is the most emotive issue in this present context - Tobins are hardly suggesting by this omission that sick people should not be included in the category of the "mainly"?.

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3.3 Existing Pavement Structure: It is relevant to point out how this road, L1204 became tarred originally, in the late 1950s or very early in 1960. The then management of the "Peatlands"- the site under this application - persuaded the local councillors that only the lack of a tarred road prevented a host of developments happening, that would involve heavy traffic. Conned again, as usual: *fuireachas an tsionnaigh ar mhagairlí an tairbh.* This fact may be a warning to be careful of overestimating the quality of the foundation works of this routeway.

There is no data given on depth of peat - certainly one day on the road is not sufficient to provide a satisfactory database of peat depth underlying this road: the road to be sequestered extends from Rosport to Bangor /somewhere else, and from Glengad to Bangor/somewhere else. Has this traffic management plan covered this?

Has a copy of the modified version of the USACE PCI methodology been provided to Mayo CO. Co.?. If so why has not a copy been lodged in the relevant planning file? Given the imperial sweep of the USACE this reference is less than useless: Iraq has sand problems but...

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Proposed Road Improvements.

4.1 Background. It is a truism that 3.3 shows that the present pavement is not capable of carrying the proposed level of loading to transport the 450,000 cu. metres of peat, but it is required to remember that this in itself significant loading is only one item of loading, and not necessarily the most severe, if one takes load weight and balance into consideration. Not alone would it be "*likely*" to cause a "*general deterioration*" but Tobins are well aware that such a deterioration is inevitable: this language is advocacy, not science.

4.2 Road improvement details. What has previously been the behaviour of this Wet Mix Macadam on a similar peat dominated basal structure, without side buttressing? Case Studies and practical applications? And Mayo CO. Co. has accepted this engineering concept already? What is the likely effect of vibration on this peat based structure, when widening contributes both interface problems and differential sinking, bearing in mind that the interface between the soft vertical peat and the new fill materials provide small friction resistance? Sliding, settlement, rupture of ground, foundation soil extrusion, rotational failure, bearing capacity failure?: in other words will the proposals here when implemented ensure that the base, old and esp. new, will be sufficiently strong and unyielding to support the new extended pavement, which in turn is expected to resist cracking over the interface of the old and the new? Please, where and how has it been done before in a hurry or not? (It is not expected to resist cracking? Interesting?) "*normal operating conditions*" give this proposed technique a life span of ten years: this proposal, in speed of concept and application and in stress, is not normal. What experience is there of "non-normal conditions? Who accepts responsibility for that "*which is not precisely determinable at this time*" on the verge of Carrowmore Lake SAC? Is it Mayo CO. Co. - the public purse? Of course it is.

In the absence of surcharging on a realistic timescale, which is a minimal requirement for weight bearing structures, this road structure would consist of 2(or three?) separate vertical weight bearing structures on a foundation of peat under different levels of compression, with little or no possibility of keying at the interface. Common sense dictates that real proof must precede such a foolhardy enterprise. Tobins' admission here underlines the basic problem - a hurried project with not enough time to plan or implement it properly.

Other haulage with heavy vehicles will function "*for the most part outside the peat haulage exercise*". It is not an exercise - were it so no one would care much: it is for real. This kind of a promise is silly and not implementable.

P.13 How did Tobins arrive at this level of compensation for the hurried implementation of this project? Holy Ghost? No effort is made to justify the choice of scale placing: i.e. it means nothing.

"*The selected pavement design is demonstrated to be adequate*" but "*it is not possible to predict with total accuracy the behaviour of the strengthened pavement*". So, the design

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is irrelevant, and Tobins take responsibility for whatever results the design may throw up? They do, like hell.

"*there would be noticeable settlement in the widened section of road compared to the existing pavement edge*". So cracking of the pavement at the interface is modelled into the proposal, and ingress of water etc? At least you're honest.

Mayo Co. Co, have recent experience of this type of result, which was then unaccountably unforeseen. Around five or so years ago Mayo Co. CO. road staff began to tidy up the roadsides in Erris and in the process add a little width to the pavement. (One of our group of signatories noted at the time that a similar effort in the sixties on the Limerick to Fermoy road led to the death of a milk lorry driver when the milk container snapped away from the trailer and broke the man's neck, when he inadvertantly drove onto the "new" part.) Within a few weeks, a lorry load of gravel being carried by Lennons, Glencastle, sank at Ballinaboy, at the junction of L1204 and R314, a lorry of Comhar Iorrais sank near the junction of R314 and L1203, an oil lorry sank on the R314 near the junction with the R313. This is a mere sample list.

4.3.1 Two Way Carriageways A tolerance of 0.5 metre between two lorries, necessitates the use of the entire road width out to the edge: if this is their experience, we feel we must congratulate Tobins on their super drivers.

4.4 Bridges and Culverts "*the loads arising from the haulage exercise are not expected to exceed 24 tons GVW*": I understood that the loads of peat (explicitly in question here) were to be limited to 11 tons? Lorries nowadays have mighty heavy tare!

It would make sense to remember the bridge destroyed by a few hours rain in recent years.

5. "*This TMP is an evolving document*". Does this mean " you make it up as you go along" or what are the parameters outside which evolution becomes creation?

5.1 Enabling Works Materials Import. The number and variety of assembly lines and flow charts in practice here remind one of the incessant construction activity of Fraggle Rock.

It obviously means a hell of a lot of lorries and a test for traffic management.

5.3 Exported Materials 66,000 tonnes "*suitable for site remediation elsewhere*" : The mind boggles. Where is "*elsewhere*", how does one get there, what is there when one does, is it licensed, has it existing planning permission? Above all, why so coy about it, suddenly remembering that Tobins are also regularly consultants for Mayo Co. CO. and for some relevant clients of Mayo Co. CO. - why so coy? This conversation piece is not sufficient in a planning matter.

If it is a "*realistic prospect*" that the lorries of stone will also double as waste removers, then unless the two dumps are the same, the figures given in this document are hit and miss at best. Not planning material.

p.20 Are we to understand that, if the fairy godmother is on the beat making "unsuitable" material "suitable", some of the 450,000 metres cubed of peat might suddenly get an upgrade in status : in other words is this a "wait and see" of which we got lashings in previous applications?. Sorry. It is not good enough for planning: this "make it up as you

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go along" gave us Derrybrien. Tobins need to give chapter and verse on how this metamorphosis has occurred in the past and how it can be possible at Ballinaboy.

5.4.10 Accommodating the Needs of Local Residents. We wish to point out yet again that the roads in question are vital to the population north of this proposed project. It is evident however, that the hurried nature of this proposal has ensured that the real issues are dealt with only on a hit and miss basis. There is no holistic study, even in a narrow sense, of the implications of this monstrosity for the population and its environment, except as selected and defined by the developer's sub-contractors. The "*local needs*" here dealt with, are those imposed and identified by the transport contractors and consultants.

5.4.15 "*fugitive spills of water from tailgates*" are mentioned and then forgotten. These "*fugitive spills*" happen along Carrowmore Lake.

p.30. The filling procedures are such that no one could implement: desk top stuff.

The foregoing deals only with the road from Ballinaboy to Bangor: this is not the whole story or anything like it.

Transportation of Materials Associated with Pipeline Construction.

5.6.1 Onshore Pipeline to Terminal. All the materials are to be brought to Ballinaboy in lorries from Bangor or wider afield, whatever that is supposed to mean, but one could guess some of it: this is hardly an input to a planning application, for every source brings different implications for traffic management and environmental reception, built or naturally occurring. When the materials arrive at Ballinaboy they take different routes:

1 pipes and fill along the L5244 to Glengad (the warning sign road, where landslides are supposed to be an immediate threat.)

2 pipes and materials along the L5244 and right to the Glenamoy River along wayleave.3 Pipes and materials to Rosport , i.e. Léana Mhianaigh, Seanmhachaire.

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It is proposed to bring the materials and pipes along the wayleave - on 20 feet of bog over a long section from the Glenamoy River. There is no breakdown of materials for the various sections of pipe trench or the access points required and viable.

There is no mention of the waste excavated to make way for the pipe: it has'nt gone away you know!. It must be transported from the wayleave on something and a donkey won't do. It speaks volumes for the structure of this proposal that the removal of these enormous amounts of waste has not been addressed. The wayleave has to accomodate the initial loads of stone for fill, then endure the loading of pipes, then excavators,etc.

It is obvious that the developer has not taken on board the fact that an excavation like this in a bog is in effect making an underground road in a bog, which also serves as the floor of a drain. " *Peat deposits are very compressible,..Consequently they are not suitable for foundations of roads railways and buildings. ...Laboratory tests are often a poor indication of how peat will perform when loaded, because of* ***rapid horizontal drainage under load in the field,*** *which is not revealed by laboratory tests in a confining vessel. Other problems with peat include low stability (tendency to creep) on* ***slopes,*** *wastage*

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*when exposed and subject to drying, **a tendency to float when flooded**, and the generation of methane leading to fires.* (UCL Department of Geography, *Quaternary Environments*)

p.34 This haulage of materials is to be done in February and March: We don't believe this proposal is serious: 2831 loads of HGV, at 20 tons a time, much of it over deep liquid bog, in February and March, not to mention the return of the waste to somewhere undefined!. Will you look at the roads from Glenamoy to Léana Mhianaigh and ask the roads engineers who are struggling with the Bun Abhna - Muing na Bó section. Someone along the way must be sane.

5.6.2 Sales Gas Pipeline from Terminal to Bangor. There is no traffic plan at all for this section of work: no allocation of lorry loads to individual sections. This info. must be available as it is proposed to access the wayleave at a number of points. This is very slapdash and smacks of arrogance. Again there is no mention of disposal of the excavated peat and other wastes, for the disposal of which there needs to be waste licence and some mention by the EPA. There is more involved than a few wheelbarrows of muck. The excavated material, as in the case of the pipeline from Glengad to Ballinaboy, is not segregated :it just hangs there, a little off stage, in the wings. Very slapdash and unacceptable. Again emphasising that this hurried job was never properly analysed, even as a dig-and-carry operation.

6 Review and Updating "*winter period*" the flooding and destruction at Glencullin and Glengad occurred outside this nice box of winter, in summer and autumn. To go on this basis is irresponsible in the extreme.

One gets the distinct impression that the developer does not intend to implement much of the hauling and carrying necessary for this proposal if it gets permission. This submission smells of gung ho.

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Risk Assessment Matrix.

We are totally at a loss to understand how Mayo Co. Co. has taken on itself responsibility, financial and other, for risks undertaken in progressing a non-public project. It is incredible that, in advance of a planning decision and as an advance on the position indicated by the pre-planning file, that the public purse is thus mortgaged for the further benefit of Shell, which company already benefits from the most placid leasing terms in the world. Whether this is a guarantee to Shell by Mayo Co. Co. that Planning Permission will be granted to this version of the project or not, we have no doubt but that the consent of Mayo Co. Co, as here expressed to taking responsibility for such compensation as may arise, has legal implications for the public purse, and is an invitation to members of the public, to Shell and to contractors within the scheme, to further scrounge off the tax payer. Add to this the fact that the taxpayer is the owner of Bord na Móna, its originator and its paymaster. Here again and on into the future, the taxpayer is being put in hock to this version of a project: (a semi-privatised contract State system is becoming indistinguishable from a State subsidised private sector). We demand that the

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names and identities of the individuals responsible for this treason be made available to the public for future reference. We have no problem with Shell playing hardball, but it is hardly cricket for people paid by the public purse to so cravenly lie on their backs and think of mother England.
We are incredulous.

Submission on Response to Item 2, Vol. 1

2 "Written confirmation .....deep peat soil."

The enclosed consent (April 15th, 2002) does not confirm that the design of the proposed pipeline as requested is suitable to ensure its stability. Rather it requires the developer (item 11) to draw up an Environmental Management Plan (where is it or is the faith test being applied?)"*to provide detailed construction methodology. The plan should address, separately, both the construction aspects* (i.e. the pipeline and ancillary constructs *and the operational aspects and should as a minimum include i.Traffic management. etc.*"
Likewise in item 16:"*The methodology of pipelaying within Broadhaven Bay, at the landfall and between the landfall and the terminal, shall be agreed with the Department before commencement of construction.*" Where is the agreement? Minister Woods' statement at the head of this submission applies.
Noteworthy also is item 19: "The developer shall undertake additional traffic studies and submit a Traffic Management Plan for approval to Mayo County Council for the management of construction traffic associated with pipeline and landfall construction activities." May we suggest that what has been attempted in this direction is quite anaemic and not adequate. Where is it?
Is Mayo Co. Co. in a position to grant planning permission for a structure on the basis of unknown/secret/whatever-your'e -having-yourself/no plans?
It defies logic to imply that a high pressure pipeline floating on up to 20 feet of bog can be stable structurally. It is not possible to distinguish between that part of the landbased upstream pipeline that is outside the terminal site and the greater part between the landfall and the terminal boundary - the same physical reality rules: in neither case has the developer shown that the regulatory authority has confirmed the proposed methodology as suitable: indeed it must be said that no regulatory authority has seriously addressed the issue of a vibrating pipe in deep bog, on a slope to Sruth Mhada Conn.
The onshore requirements of this consent, albeit issued by the offshore authority, are for leakages, not structural stability, line inspection and maintenance. The exclusion by PAD in this consent of any considered response to 8 Kilometres of land pipeline, illustrates once again the absurdity of the location of this proposed refinery and the project splitting which it entails, which leaves the PAD in the untenable position of issuing licences and leaves for farmland, pasture and bog, on the pretence that this is foreshore. It is definitively clear that the foreshore ends at the high water mark, and no amount of legalistic shenanigans changes this.The evaluation prepared by Andrew Johnson of the Onshore Pipeline Design Code for Dept. of Marine and Natural Resources, which underlies the consent as enclosed, specifically excludes any activity within the Terminal site: "*It is understood that the terminal QRA*

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(prepared as part of the terminal design) .. .will consider the risks associated with all facilities within the terminal site, including the pipeline facilities." (28 March 2002)

Submission on Response to Item 3, Vol. 1

Not answered.

Submission on Response to Item 4, Vol. 1.

There is little point in being fussy over human generated sewage in this area, when the entire sewage of Belmullet and its' trade effluent, go untreated straight into Broadhaven and Blacksod Bays: and still planning permission is being given for hundreds more tax driven dwellings and bedrooms to prospectively dump tons more of the same human and trade effluent daily into the Bays. Were the market developed we could sell E-coli in place of WMD.

Submission on Response to Item 6, Vol. 1.

6 Submit a map .....clearfelling etc

The proposed transported peat consists of the entire depth of peat. Therefore all phosphate concentrations are removed to the dump at Srahmore. What is the potential effect of binders on this?

Does the dumping of carcasses (dogs, cats, fish, rabbits, horses, cattle) contribute to phosphate concentration? Have the unearthed carcasses be species identified? Why not?

The acrotelm will be removed entirely, and given the drainage history of the site, the status of the acrotelm is mote. The phosphate on site is only immobile until it gets a lift to Srahmore.

Drain 22 again lifts its enigmatic head. It is the most difficult element in the entire drainage of the site, and inscrutable. The source of the phosphate here remains a mystery, as does the amount of water flow and the pollution. It is more than a drain: it is a spring(s) also, a stream. It has been marked on the 6 inch ordnance survey maps in shortened form since the first mapping and is probably the most important drainage element historically. This bald statement hardly answers the request to provide a comparison etc.

Drain 22 has some of the mystery of another famous bog hole within the terminal site, where the water disappears underground and no one seems to be able to trace where it comes out. This has baffled the multiple consultants of many applications to Mayo Co. Co. on behalf of this project. Realistically, in the vicinity of a spring fed lake of such importance as Carrowmore is, a mystery of this nature should immediately call a halt to development that impacts on the hydrology.

Anyone who believes that "*The stored material will be covered with waterproof sheeting in periods of high rainfall*" is too innocent for this bad world.

The excavated materials will not for long impact on the Ballinaboy site, because - wait for it - they will be impacting on the Munhin and Abhainn Mhór.

Submission on Response to Item 7, Vol. 1.

7 Detail of site ... should be provided.

I hope you get the message, Mayo Co. Council: don't waste Shell's time: go and read the EIS.

This response is a non-response. The magic bottomless boghole is nowhere to be found on the drawings, although it featured prominently in two sessions of a long oral hearing.

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Submission on Response to Item 8, Vol.1.

8 Baseline ....around the site.

Raw data was requested and no raw data is given. The mixture of data of varying definition and integrity leaves this response useless. According to the response, the required data is not available, i.e. has not been acquired.

p.3 refers to 12 months sampling: page 2 specifically states that a full year's data is not available, or maybe we are misreading page 2 or page 3 or both.

Table 13: Drain 22 again raises its enigmatic head: We wonder why? It needs explaining and real research over essential time.

3.3 Drain 22 classed as "*seriously polluted*" - We wonder why? Is it significant?

The picture here is of a water system already stressed, under pressure. This proposal would further degrade it and put Carrowmore Lake at greater risk.

Who is responsible, in the absence of bonding, for compensatory re-establishment of status quo or better? What a ridiculous question, Charlie Brown!

Submission on Response to Item 9, Vol. 1.

9 information and ...other acids.

Bord na Móna is presented here in terms of "typical" results to events. In fact, what is proposed is so much different to what Bord na Móna actually does, that it is completely misleading to equate this waste activity with the work Bord na Móna is highly experienced in. Not even their UK subsidiary, The Brightwater Group, specialising in sewage, industrial and municipal wastes and sludge, has such an undertaking as part if its c.v., although no doubt such expertise can be put to good use in projects such as the Muing Mhór perfumery.

It is essential in dealing with these matters to give a cursory, at minimum, look at what Bord na Móna actually does, that qualifies them as implementers of this proposal: otherwise we are in danger of living in and dealing with a "reality" equivalent to reality TV. The following is taken from Bord na Móna "*Report on Corporate Social Responsibility 2002-2003*" : "*Undrained or pristine peatland has a water content of approximately 95%* (a). *Before development a peatland is surveyed and a drainage plan designed. Drainage reduces the water content of the surface of a peatland from 95% to 80*(b)*% and removes more than 75% of the water from the surface layer.*

After about three years of development work the fields are cleaned of vegetation and shaped. etc. There are essentially four operations in milled peat production(c)*: milling, harrowing, ridging and harvesting.* <u>*Milling*</u>*:In the milling operation a thin layer of peat, usually about 15 millimetres deep*(d) *is cut from the surface of the peatland where it is left to air dry over a period of a few days. The water content of the crop in this layer of peat after milling is about 80%.*(e)

<u>*Harrowing*</u>*: In the course of drying, the layer of peat is turned a few times to make the best use of available solar energy.*(f)

<u>*Ridging*</u>*: When the layer of peat on the surface of the peatland has reached the target water content, it is collected into ridges in the middle of each field.* (g)

<u>*Harvesting*</u>*: Haku or Peco system. "*

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(a) The existing drainage at Ballinaboy does not seem to have been very effective - i.e. it seems to have broken down. and the moisture level is as high as originally. This would correspond to visual evidence.
(b) Bord na Móna drains for 8 years(or is it less - figures abound)to get to this level of 80% and 75% in the acrotelm.
(c) "milled" is what Bord na Móna do - not mass excavation on this scale.
(d) One inch (1") at a time is removed from a surface that has already lost most of its moisture: **one inch.**
(e) Even off the top layer, after draining for years.
(f) "Had I a spoon, had I?"
(g) Windrowed **after** it has reached the required moisture content - not before.

It is up to Bord na Móna to explain how the methodology suitable for the above process can justifiably be applied, with no piloting to the circumstances of this project. This is for real.
In this section also, "*gradual*" is used again and again. It must be noted, in view of the above, that nothing in this proposal resembles "gradual" in the normal lexicon of Bord na Móna - where the context is reducing 8 years to nothing, "gradual" has lost its meaning.
No raw data is given for the "widespread monitoring".

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Submission on Response to Item 10, Vol. 1.

10 A schedule ....are not specified).
Seasonal constraints will surely apply for salmon and eel and peal and trout on the Munhin and Abhainn Mhór.?

Submission Response to Item 11, Vol.1.

11 Information on ...in this location.
It is hard to accept that the binding agent will have no effect outside the site but it may be true. Again the precautionary principle applies.
Peat Stabilisation:-
1.2 How is "*stabilisation*" more "*sustainable*" than total removal?
We take exception to the comment: "*Experience has shown that stabilisation is particularly suitably for peat*". No evidence is suggested for this universal comment.(It is a perfect example of the language of the neo-cons in the United States of America who have perfected it = empty language, lost performative: "Thank God for George Bush": there is no answer possible.) Nor some pertinent facts, not least among them being i. soils containing more than 10% peat must be thoroughly tested before stabilisation, for not all peat is suitable for this process, at the present state of knowledge; ii. Although the total amount of stabilisation work in soft soils undertaken in Japan (in particular) and Scandinavia, and latterly in the United States, is substantial, only a minuscule fraction of this work is in peat, which is very much the Cinderella in this business. iii. Stabilisation work in peat, owing in part to its' deficiency in pozzolanic minerals, is undertaken as a last resort, not a first choice.

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1.3 No raw data to back up cement bureau statements, which may be completely justified, but the issue of advocacy and underlying absence of responsibility for outcomes requires caution.

1.4.1 Peat is a specific type of soft soil, and it is misleading to throw in figures relating to soft soils as if they are relevant to peat: very little of them are relevant. My understanding of the proposal is that it is not envisaged that mass and column stabilisation should be used on this site.

(SGI are indeed world leaders in soft soil technologies and their advice is expected to increase ten-fold the U.S. present output of 30,000 cu. metres annually of soil treated: compared with the Japanese output, this is tiny. However, very little soft soil technology is relevant to the peat at Ballinaboy or anywhere else for that matter.)

1.4.2 The samples given are hardly indicative in any case. Pre-loading is not proposed, not even in road widening; a mix of peat and clay is not relevant; use of columns not proposed; elements do leach from the binder; ratios of peat to binder vital, also depth of peat, drainage status, etc. This work has a promising future, but very limited prospects in Ireland, because of political-economic issues that do not concern us here.

2.1.3 Where and how has this been done: raw data is absent. This is a proposal for real - not a trial, with a real not a theoretic outcome.

2.2.2. So testing is ongoing - no results available. So, the time constraint on good work kicks in again. Laboratory tests in peat, especially relating to physical and mechanical properties, are notoriously unreliable and until proven on the ground, in a dynamic situation, must be very sceptically treated.

2.2.3 'Tis a bit late to verify when decisions to go ahead are in place.

2.2.4 On what basis is it estimated that 36,500 tons of binder will be needed, when SGI has only recently been hired to do this work, and have not reported ?

"*Further 178,000 m cubed*": where are they or from where are they? Are they in situ or on the move?

2.2.5 Pre-loading/surcharging is not proposed for this site? Why introduce it? Be real.

3.1. Of course what the binder does not reach won't be stabilised!.

"*The addition of binder decreases permeability*" is a very simplistic presentation of the reality on the ground and going forward. Surely it is not being suggested that the chemistry involved and inevitable heating will evaporate or similarly use up all the water in the sites being treated? As I understand it these sites will be covered with structures and will inevitably dry out, unless constantly fed with water - hereby is the major fire hazard as peat spontaneously combusts when dried out. But unless the entire depth of the profile in place is to be dried out in the stabilisation process, it is miraculous that all the void spaces are to be filled? We would like further information on EuroSoilStab's "Design Guide Soft Soil Stabilisation" to see the extent of peat study rather than just soft soil.

3.2 Chemical Properties It is our understanding of the chemistry of these reactions - admittedly rudimentary - that peat soils are typically deficient in pozzolanic minerals

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needed to react with the calcium hydroxide in the cement, and that therefore the best results are obtained with cement in conjunction with a pozzolanic additive? Without the additive, the chances of calcium hydroxide migration are surely higher?

3.3 While the trace elements are dealt with the soluble alkalis are not. Why not? Tests carried out when the damage is done are irrelevant.

4.3.1 If the sub-surface flow is minimal, why has it not been possible to trace the destination of water disappearing in the magical boghole? Or is that why 'tis minimal?

4.3.2 Hydrology At last an admission that an increase in alkalinity in this very acidic environment would not be surprising, and of course sedimentation: 'tis obvious.

Submission on Response to Item 12, Vol.1.

12 The basis for ...settlement ponds.

"*The model uses two parameters, impervious areas and rainfall intensities, to calculate the peak runoff.*"

Tobin's report on the Glengad/Dún Ciortáin floods and landslides, seems to demand that a third parameter is essential to a proper basis for the calculation of peak runoff. Tobin, in its' report to Mayo Co. Co. attributes the calamity to the dry condition of the peat previous to the heavy rain on the relevant night: this opinion seems to be supported by the inhouse report prepared by GSI and supplied to Mayo Co. Co. and to Tobin. It seems reasonable to assume (unless evidence contradicts the official Tobin report) that the model used by Shell as here presented, although simple and two dimensional and thus easily understood and plotted, will give a theoretical reading that does not allow for the extreme conditions already encountered here, in September 2003. The usefulness of this model would seem to be questionable. An extra degree of complexity would seem to be required by what is not a simple system.

The information requested has not been provided. There is no information on the assumptions regarding size of settlement ponds required, why Bord na Móna experience unmodified is relevant, indeed decisive. It is not shown that Bord na Móna methodology is directly transferable: inputs are so different that the combined effects must be different. Unquestioning acceptance of the Bord na Móna experience, acquired by a different process, under different guidelines, with different ends in view is misguided, simplistic. The costs of this airy fairy judgement are ours to bear. One item of difference: the settlement ponds of Bord na Móna take runoff from a well drained acrotelm(sic). When it rains, some soakage occurs to cushion the run-off. This does not happen where the living acrotelm has been removed, and is decisive in flash flooding.

Submission on Response to Item 13, Vol.1.

13 investigation of ...settlement ponds.)

Not dealt with - especially the suggestion of a floodplain approach to potential flooding. Item 12 relevant here. Shell again seems to see that Mayo Co. Co. have a problem reading the EIS.

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Submission on Response to Item 14, Vol.1.

14 Examine the ...underlying peat.

"*The proposed location allows the entire site to drain by gravity*" does this contradict the response to item 13?We don't understand the significance of "*minimising supplementary groundwater recharge at higher elevations*". Nor is "*uncontrolled loading*" significant to this query?

Submission on Response to Item 15, Vol.1.

15 data history ...solids.

The response here is very weak. It is significant, however, that no statistics or measurements have been presented in support of any issue, that precede the submission of the first application for planning permission: or indeed the second application. This in itself is an index of intentionality and not very comforting. If the query was worth making, it has not been answered.

Submission on Response to Item 16, Vol. 1.

16 Proposals to deal ....site.

Covering wet peat with plastic sheets is standard Bord na Móna practice??. It is, when dealing with dried long lines of windrowed milled peat. This is another misleading reference to Bord na Móna: it does not cover and uncover wet peat, not even where it deals (or has dealt) with sodded turf. Rows of milled peat awaiting transport to the firing squad is so covered - but not on a "run out and close on the hens" basis. Without such covering the vacuum harvested milled peat would blow away, as much of it still does much to the discomfort of householders on the wrong side of the prevailing wind. On the basis of this tongue in cheek answer can we visualise a squad of Bord na Móna workers waiting patiently for the first drops of rain, which is the signal for them to charge around (in the wind) pulling enormous sheets of plastic into place?. Do ye think we are all of us stupid?

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Submission on Response to Item 17, Vol. 1.

17 A detailed ...routes.

The main bulk of waste generated is peat. However, no proposal has been made for the disposal of the waste excavated from the proposed pipeline from Ballinaboy to Glengad (8 Kilometres) or from the BGÉ proposed pipeline from Ballinaboy to the Bangor vicinity or the unsuitable non-peat waste from the terminal itself. Such an oversight beggars belief. Is someone hiding something? Insíodh sé scéal ar féin!?

Submission on Response to Item 18, Vol.1.

18 Figures 12.1 to ...numbering

Exposure of residents to 24 hour noise in an open rural area, as detailed in the EIS is a disgrace to contemplate. Even the barking of dogs from the laboratories next to the

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proposed refinery site is heard for miles downwind at all times. We do not know how bad the proposed noise level is to be. George Bush is in trouble for announcing WMD from where none have materialised, thus presenting a new situation where even the most powerful are being held to account for what may have been an economy with the truth. The same applies to this project, but with no bonding proposed, and the State accepting all the risks ??

A recent article by the Director of Psychology at St. Vincent's Hospital, Dublin, states that "*The guidelines allow building noise between 8 a.m. and 7 p.m. from Monday to Friday and between 8 a.m. and 1 p.m. on Saturdays....This is the dissonant demise of the quality of our lives in the interests of progress.*" "*CALM, the network of an EU initiative on noise emission recognise(s) 'no person should be exposed to noise levels which endanger health and quality of life.*'" "*The issue is an issue of public concern, of health and safety.*" *(Irish Times, Monday March 29, 2004).* And the relevant authorities.

Submission on Response to Item 1, Vol 2.

1. Additional water ...conditions.)

No treatment of the possible or likely presence of carcasses or their extent or nature or potential toxicity. We have lost track of the exact designation of the water samples.

Submission on Response to Item 2, Vol 2.

2 Reconcile ..(249-632mg/l)

We can make neither head nor tail to this bit of special pleading: we have a feeling of being conned by "*total solids*" and "*suspended solids*".

Submission on Response to Item 3, Vol 3.

3 Indicate ...adverse effect.

"*being wetter*" You can try, but you can't have it both ways: you cannot here argue that the peat is wet and therefore not likely to increase nitrogen levels at Srathmore, while arguing repeatedly elsewhere that this same peat has dried out considerably because of drainage. This type of advocacy increases the suspicion of what the developer intends, if allowed to proceed on this sensitive dynamic environment.

3 a) Given the special conditions under which measurements of Oct. 29th, 2003 were carried out, they are not a basis for anything except for throwing in the bin.

b) The conclusion "***will*** *have the effect of reducing ammonia concentration*" is derived from "*this* ***suggests***" in 3a). Apart from the redundancy of 3a) which negates the entire sequence, one swallow does not make a summer. This sensitivity to suggestion is nicely touchy feely but not very useful. The importance of this project deserves better than this juvenile logic.

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Submission on Response to Item 6, Vol.2

4 A map ...contours.

The response deals with the construction phase only: much more terrifying is the prospect of a 24 hour industrial rumble going on forever. Ref. to submission on Item 18, Vol.1.

Submission on Response to Item 7, Vol 2.

7 An assessment ...peat soil.

It is sad to again have to note the efforts by an important sub-contractor, owned as yet by the taxpayer, i.e. Bord na Móna, to cope with the pathetic initial presentation of the case for this project. The planners were expected to tolerate any old cod, dished up in a fish cake. This less than BAT approach has dogged this project/concept from its initiation, and allied to the ever present political advocacy and promise, has led to undue delay and inordinate expense for the developer and still being pushed to put a good potential project in the wrong place.

Investigation into handling of raw peat:-

2 Is Bord na Móna suggesting that juncus effusus has roots that penetrate over 5 metres into the bog?

We fully accept that under the definition of slurry as given by the author of this response no peat that I know of could be called slurry - much slurry could be extra the definition. We have difficulty with "*pulverised*": we know that peat, however, dug out in sods by a JCB-type machine will not "*maintain its shape readily*," and is a frightful mess if heavy rain follows extraction, even in old drained turf banks.

"*windrowed*": Where does Bord na Móna "windrow" heaps of raw peat ("*stacking of peat in piles*")? Where have Bord na Móna developed the cumulated experience to know what is the effect of this copying indiscriminately of vacuum harvested peat technology. Where is the data - even unverified data - for this dream topping? It is reasonable to expect the outer skin to dry substantially even in 8 days of good drying conditions, but in the circumstances depicted here, the potential for "*draining away*" from the mass of the peat is very limited. The description given here is of a milled peat experience and does not transfer.

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4. **Industrial Field Trials.**

<u>When does a Field Trial Justify a Conclusion?</u>

4.1 One swallow does not make a summer, but believing that it does, gives us the Snarl at the Mad Cow (Red Cow). In order to show how ridiculous are the conclusions drawn here from one tiny unvalidated test it is necessary to show what "science" is and is not:-

A nondescript cyanobacterium, *Nostoc commune*, lives in shallow depressions in limestone outcrops. Very exposed, it has learned to secrete a glycan that immobilises the cells during dry periods and protects them from dehydration. We mammals can't do this and so drought fighting is beyond us and our cells etc dehydrate = dead. A biochemist Malcolm Potts and Richard Helm, an analytical chemist, thought that maybe the specific glycan could help protect and preserve human tissue; did a test on mouse and human kidney cells. They used the glycan to dry and maintain the cells for three weeks, and when they rehydrated the cells they were perfect, with their structure intact.

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Therefore the experiment was a success? Yes. It proved that human cells can be preserved in a dehydrated state and then be rehydrated successfully? No, it didn't: it proved that two samples of kidney cells, were dried and preserved for three weeks, using the glycan technique, and were successfully rehydrated. That is all. It suggests possibilities: storing enzymes under normal temperatures, stabilise blood for transfusions, long term preservation of human organs (years maybe). No one would propose that these possibilities are facts.The important point is "mairg do ghní deimhin dá dhóigh: drawing generalised conclusions from one test or so, is pub talk standard science or engineering and should be left in the snug.

4.2 A trial. How deep a sample of source peat; drainage status; water content; etc: without control of variables a test like this is only codding oneself.

"*wetter*" means nothing - just a comparative: how deep are the drains, how long the drainage period, where was material sourced vis a vis the drainage channels, etc. can help put meaning into the comparative.

A vacuum harvested bog has no acrotelm, which is the living layer. The mixture from Ballinaboy is to be dumped on a compacted catotelm, and then bulldozers are to drive over and back on the dumped waste to do what? The surface of the catotelm compacted from machining forms an interface and potential drainage surface etc etc. It is the acrotelm that contains the seed bank: modern practice is to store it to help towards limited restoration - not possible to do in retrospect.

Derrylea Case Study: This study is in no way comparable to conditions in this project. The peat being bulldosed in Derrylea is a turf bank, and because of this is already drained substantially in its bulldosed entirety, as any bank of turf is, not alone by gravity but by wind and evaporation. We do not know how long the bank of turf in Derrylea was operating, or how deep the cutting, or if the cutting was from both sides of the bank or one side only. What is bulldosed here is the acrotelm and the top layers of the drained catotelm. Of course it worked - it was sensible.

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Submission on Response to Item 1, Other Matters.

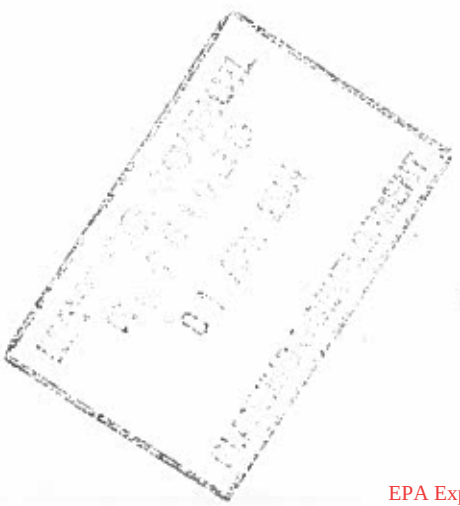
1 Please submit ...the haul route.

As no bonding is proposed for any promises, whatever the subject, in this instance the number of traffic movements per day, one does not expect them to be complied with.

4.5 A cynic might suggest fattening the goose for Christmas.

4.6 What a vacuous comment emphasising the gap between reality and the developers agents "*Landscape disturbance is significantly reduced by using an existing road for the haul route rather than* ***constructing a new dedicated route.***" We must accept that the possibility is hardly more crazy than the basic concept .

All in all, a tongue in cheek performance.



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Finally, we the undersigned do not consider that the substantial extra information provided on behalf of Shell has made this project more viable in planning terms. We note shortly the historical consistency of Bord na Móna discourse and its conflicting historical record on the ground. We note anxiously the weight of traffic proposed to be borne by the L1204, especially given that this road was off limits to heavy vehicle traffic in Co. CO. responses to earlier planning applications, which decision we presume was not arbitrary. We note the silence on the traffic and loading implications for the L1203, L12035, L52453, L52453-25 and the L1202, all of which roads must be earmarked as carriers of substantial plant and materials traffic and removal of waste.. We note the uncertainty or complete silence on dumping location(s) for considerable bulk of waste, and are surprised that the Co. Co. survey of 9 bridges on the R313 and R314, including one of a mere 7 tonne bearing capacity, or an update of the survey if such exists, has not been alluded to or whether use of these bridges for HVT has been outlawed. We note with considerable unease, that EU and national requirements on project splitting seem to be ignored. We note that the importance of stratification/layering for the stability as such of bulk peat has not been addressed. Finally we draw attention to the concept of "wise use" of mires, taken from the Ramsar Convention on Wetlands and accepted by Bord na Móna among others, and its widely accepted definition (accepted by Bord na Móna) defined in the acclaimed work "*Wise Use of Mires and Peatlands* - **Background and Principles including a Framework for Decision-Making" by Hans Joosten (Greifswald University, IMCG) and Dónal Clarke (Bord na Móna):**

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Wise Use

"Those uses of mires and peatlands for which reasonable people now and in the future will not attribute blame."

$$$$$$$$$$$$$$$$$$$$$$$$$$$$$$$$$$$$

£££££££££££££££££££££££££££££££££££££

Signed by the following, on their own behalf, without prejudice to other such submissions as they, individually or severally, may otherwise lodge with regard to this project :-

Micheál Ó Seighin

Micheál Ó Seighin, Ceathrú Thaidhg.

Uinsionn mac Graith

Uinsionn mac Graith, Ros Dumhach

Uinsionn Mac Graith

Uinsionn maac Graith, Ceathrú Thaidhg.

Treasa Ní ghearraigh

Treasa Ní Ghearraigh, Ceathrú Thaidhg.

Caitlín Uí Sheighin

Caitlín Uí Sheighin, Ceathrú Thaidhg.

Bríd Ní Sheighin

Bríd Ní Sheighin, Ros Dumhach.

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Rossport South,
Ballina,
Co. Mayo.
30 March 2004.

Mayo County Council,
Planning Office,
The Mall,
Castlebar,
Co. Mayo.

03/3343

Objection Submission: Re Shell Exploration & Production.

Dear Sir/Madam,

I am writing to you with serious concerns regarding the latest requested information supplied to your department by Shell Exploration & Production for a gas refinery in Bellanaboy.
One aspect is the health and safety aspect of the proximity of the pipeline: approximately 70 meters from my home and other occupied residents, what, if any, criteria was used to determine this distance.
Furthermore on the engineering aspect of laying the pipeline, are they aware that the rock is very close to the surface and would require blasting. The consequences this would have on our land that is on a steep decline towards the shore would result in landslides.
If the proposed pipeline goes through my land, my farming activities would be disrupted if not completely wiped out.
There is also a threat to a pure spring water well, at the foot of the cliffs that has been providing clean drinking water to our families for generations. Blasting would cause this to become polluted, in addition to polluting Sruth Fada Conn Bay.
Another aspect of the route of the proposed pipeline is the untreated gas and other impurities going through our land at 150bar pressure; this a huge underlying threat, which is more experimental rather than proven.
Regarding the removal of peat from the gas terminal site, it is far from satisfactory, based only on theory and desktop analysis.
The traffic management plan is incredibly unrealistic, especially on the network of narrow, winding roads and unstable bridges and no alternative routes, except those that are signposted: DANGER OF LANDSLIDES AHEAD. Not an attractive option.
So, in conclusion the best option would be to leave this development until the technology is advanced enough that it would be environmentally friendly to the residents and the environment and most importantly safe.

Yours Sincerely,

Brendan Philbin.

Brendan Philbin

MAYO COUNTY COUNCIL
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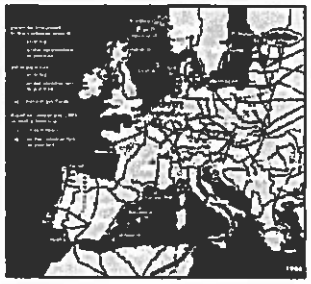
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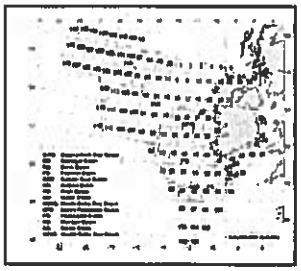
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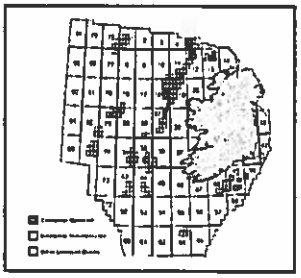
THE BRIAN COYLE OBSERVATION & OBJECTION REPORT TO THE FURTHER INFORMATION RESPONSE

SCANNED









By Brian Coyle,
BE, CEng, MIEI, MIStructE

Chartered Consulting
Civil & Structural Engineer

Director of
COYLE KENNEDY LTD
Consulting Engineers

REFUSAL SHOULD BE GRANTED

TO THE SITE CHOSEN FOR CORRIB GAS TERMINAL

THE PROPOSED CONSTRUCTION TECHNIQUES & ROUTES

THE PEAT DEPOSITION SITE AT SRAHMORE

THE UPSTREAM HIGH PRESSURE PIPELINE ROUTE

BASED ON ITS WORLD RECORDS AND THE FURTHER INFORMATION RESPONSE

Should we allow the Corrib Gas Field to be Connected:

- To an Inland Terminal

03/3343

And

- Becomes the only Inland Terminal In the WORLD?
- Surrounded in BLANKET BOG that can become unstable at an angle of 2degrees or more
- Connected from a Landfall at the Base of a Hill that is Unstable
- Residents as close as 60m to the High Pressure Untreated Pipeline
- Residents within the Explosion/Gas Vapour Exclusion Zone from the Terminal and High Pressure Pipeline
- Streams and Rivers within an exclusion zone feeding into a major drinking water supply
- The only World Wide Deposition of 450,000m3 of Acidic Blanket Bog
- Causing in excess of 100,000 traffic turning movements during its development
- Resulting in the removal and discharge of at least 400,000,000 litres (Four hundred million) litres of acidic wate[illegible] to the North and South of Carrowmore Lake, the only drinking wa[illegible] supply for the entire region
- In an Area of Natural Ground Instability

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Why should we?
- when all the other World Wide Authorities have done different

As We Are Lead To believe by the Applicant That There Are No Other Alternatives! When in fact there are!

Is it the lack of experience in our Representatives and Authorities that they do not know the difference between right and wrong?

We do not want an Erris EU Directive to be written similar to the Seveso II directive that was written following the disaster and the ultimate consequence to people in the small town called Seveso in Italy.

The Content of this report is written without prejudice

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Observer and Objector

The observations and the reasons given for refusal contained in this document are compiled and written by Brian Coyle BE, CEng, MIEI, MIStructE Chartered Consulting Engineer and are the observations of many of my immediate family and friends that reside throughout the Erris community. These observations and objections are contained within the full text of this document and are supported with references from standards, publish documents and from the applicant's response to the further information request issued by the Planning Authority, dated 17th Feburary 2004.

Proposed Development Planning Text

Bellagelly South & Srahmore Attavally Proposed Development.

PLANNING REFERENCE NO. 033343

LOCATION BELLAGELLY SOUTH
SRAHMORE ATTAVALLY

PERMISSION SOUGHT FOR
CONSTRUCT GAS TERMINAL FOR THE RECEPTION AND SERAPATION OF GAS FROM THE CORRIB GAS FIELD, AND FOR A PEAT DEPOSITION SITE, RESPECTIVELY. THE DEVELOPMENT WILL CONSIST OF THE CONCURRENT DEVELOPMENT OF TWO SITES LOCATED 11 KILOMETRES APART, APPROXIMATELY, AND IDENTIFIED AS THE SITE OF THE GAS TERMINAL FOR THE RECEPTION AND SEPARATION OF GAS FROM THE CORRIB GAS FIELD IN THE TOWNLAND OF BELLAGELLY SOUTH AND THE SITE OF THE PEAT DEPOSITION SITE IN THE TOWNLANDS OF SRAHMORE AND ATTAVALLY, BANGOR ERRIS. THE DEVELOPMENT AT THE BELLAGELLY SOUTH SITE WILL CONSIST OF: A GAS TERMINAL FOR THE RECEPTION AND SEPARATION OF GAS INCLUDING PLANT AND EQUIPMENT; PROVISION OF 4,935 SQ M (GROSS FLOOR AREA), APPROXIMATELY, OF BUILDINGS; ACCESS ROADS; 40 NO. CAR PARKING SPACES; AND ANCILLARY DEVELOPMENTS, OF WHICH 13 HA, APPROX, WILL BE DEVELOPED INRESPECT OF THE GAS TERMINAL'S FOOTPRINT. THE PROPOSED DEV. WILL OF THE BELLAGELLY SOUTH SITE WILL ALSO CONSIST OF; THE EXCAVATION AND REMOVAL OF 450,000 CUBIC M

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Summary

- The applicants own recommendations are not been meet along the entire stretch of the public haul road even after upgrading works.
- The proposed road width of 5.5m is not verified in accordance with NRA standards or any other published documents and therefore it effectiveness and safety cannot be addressed for such large volumes of heavy traffic.
- Emergencies and contingencies have not been fully considered, addressed or resolved by this recent submission.
- The applicant has identified that the haul route is supported on 2-3m of peat
- The overall impact of the road improvement works on existing land, embankments, slope stability, drainage and private property is not fully assessed.
- Published documents state that there is a statutory requirement to provide for the health, safety and welfare of all employees and members of the public in connection with the design, construction operation and maintenance of pipelines
- Published documents state that it is desirable to avoid a route where the pipeline might be subject to heavy external stresses or where the consequences of a leak, if one did occur, might be particularly serious. In practice, all cross-country pipelines and some local pipelines will have to be subjected to a detailed safety evaluation as part of its consideration.
- The highly flammable liquid transported in the pipeline under pressure creates forces at bends, junctions, valves and all restrictions to, and changes in, direction of flow.
- Additional transient forces may be generated by pump starts or stops, valve closures etc. The vector analysis arising from high-pressure fluid in the pipeline must be resolved and hence the pipeline effectively supported or else it will fail.
- Section 2.2 in the EIS report states that the terminal is designed to throughput of 10 million cubic meters per day (350 million standard cubic feet per day).

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- Taking account of the 10 million cubic meters per day and on the basis that 'volume in' equates to 'volume out' then the speed of flow through a 508mm diameter pipeline with a 25.4mm wall thickness will be a whooping c. 2,500km/hr (two thousand five hundred kilometres per hour).

- The applicant has stated the orthophosphate impact to surface watercourses from phosphate-impacted soils is widely recognised as being a major concern in certain parts of Ireland, because it can lead to eutrophication of lakes and rivers. The orthophosphate concentrations recorded by the applicant in the blanket bog is approximately 250-10,000 times greater than the allowable concentration in lake waters.

- The milling of peat commonly associated with the work that Bord Na Mona does is better compared to harvesting crops than removing saturated blanket bog. This statement is supported with picture evidence in the Bord Na Mona Website.

- The proposed construction work (grouting) resulting in the injection of chemicals into the ground where surface water run-off will flow into rivers and streams and then into a major drinking water supply for the entire region should undoubtedly be avoided. Published documents states that this process should be independently investigated.

- The applicant has now identified that the proposed process of removing the peat is weather dependent. Waterproofing sheeting will have to be placed over the peat every time it rains. Can you imagine acres of peat to be covered with sheets ever time it rains. Therefore, it could take many months and even years to remove the saturated blanket bog in order to meet the criteria put forward by the applicant.

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Further Information Request Volume 1 No.1
Fully detailed traffic management plan.

Observation to Applicants Response

The applicants response to this request identifies that their own recommendations are not been meet along the entire stretch of road even after upgrading. The road geometry survey details submitted are extremely limited and do not convey the impacts of the road improvement works.

The proposed road width of 5.5m is not verified in accordance with NRA standards or any other published documents and therefore it effectiveness cannot be addressed. The applicant has raised their own concern in relation to the proposed road width when they suggest in Section 4.3 Par. 4.3.1

"where physically possible and where land between fences permits, a width greater than 5.5m is recommended."

It is physically possible and land does exist to meet this recommendation.

As previously identified the proposed haul route is the shortest route available to many people residing the North Erris area. The applicant has assumed that all emergences will be transported using an emergency vehicle.
This is seldom the case and often local residents transport their own medical emergences to Castlebar general hospital. Local residents have used this haul route to transport very sick people or a pregnant woman by private car to Castlebar general hospital. Once again peoples lives are at risk with this proposed development.

The time taken to travel along this section of road, with its envisaged poor quality, slippery surface, "*noticeable settlement*" surrounded with large vehicles carrying saturated and dusty material is a matter of great concern for the general public in this area. Trucks queuing at junctions to gain access onto major and minor roads will inevitably impede local traffic flow.
Therefore, emergencies and contingencies have not been fully considered, addressed or resolved by this recent submission.

There is insufficient information on the drawings submitted in addressing this request to determine the extent of the proposed road improvements.

It is obvious to anyone that drives along the proposed haul route that the existing pavement and road side embankments are not capable of supporting the local traffic that use this road. The applicant has identified that this road is supported on approx 2.0 -3.0m of Peat. Some roadside embankments are currently failing.

The drawings submitted to address this request (e.g. Drg. No. 2044-1010) contains limited information. The existing road geometry survey information included on the drawing is extremely limited and therefore the extent and impact that the upgrade works will have on adjoining land and existing land drains, water flow is not addressed effectively. The existing road is very narrow in some locations with steep unstable embankments, mainly consisting of peat. The survey information does not identify the gradient of this embankment or the location of existing land drains.
Therefore the overall impact of the road improvement works on existing land, embankments, slope stability, drainage and private property is not fully assessed.

Further Information Request Volume 1 No.2
Written confirmation from the relevant regulatory authority that the design of the proposed gas pipelines from the terminal compound to the site boundary is suitable to ensure the structural stability of the pipelines constructed in deep peat soil.

Observation to Applicants Response
The text of the applicant's response to Further Information Item No. 2 does not contain the necessary text to independently qualify the structural stability of the pipelines constructed in deep peat soil.

The applicant and/or regulatory authority has not justified or provided the qualitative assessment, analysis and design to justify that the pipeline is structurally adequate in poor ground conditions especially when it is surrounded in peat and/or mineral soil in an area of natural ground instability surrounded with heather and woodland that is susceptible to fires during prolonged periods of dry weather. We are all familiar with the intensive heat, rapid spread and uncontrollable damage caused by gorse fires. This risk exists and is more imminent as climate changes are expected to become more severe (Longer Dry Periods and Longer Wet Periods).

The pipeline route chosen should have been assessed based on its functionality, surrounding ground geology and its long-term performance in this environment. The structural stability of this pipeline and hence the Health and Safety aspects of this section of pipeline and indeed the entire pipeline must be considered.

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Sections of the submitted documentation by the applicant from the Department of the Marine and Natural Resources dated 15th April 2002 is only a partial reproduction of some sections of text contained in the following British Standards.

BS 8010 Part 1: Pipelines on Land
BS 8010 Part 2: Pipelines on land; design, construction and installation
Section 2.8: 1992 Steel for oil and gas

A reproduction of part or any part of a standard is certainly not a means of justifying the structural stability of the pipeline. These standards are also referenced in Mr. Andrew Johnston report on the evaluation of Onshore Pipeline Design Codes dated 28th March 2002. Some of the design standards mentioned in Mr. Johnston report are now withdrawn or superseded. However, the safety aspects of the standards usually become more stringent as events and failures of pipelines occur.

Like most relevant standards or publish documents associated with the transportation of materials in pipelines, these documents contain specific references to safety requirements. Section 1.3 of BS 8010 Part 1 states that;

" There is a statutory requirement to provide for the health, safety and welfare of all employees and members of the public in connection with the design, construction operation and maintenance of pipelines"

The published document titled 'Guidance Notes for Applications and Notifications for Onshore Pipelines under the Pipelines Act 1962' published in 1993 also considers Pipeline Safety.

It states that

"it is desirable to avoid a route where the pipeline might be subject to heavy external stresses or where the consequences of a leak, if one did occur, might be particularly serious"
"In practice, all cross-country pipelines and some local pipelines will have to be subjected to a detailed safety evaluation as part of its consideration. This is particularly the case for high pressure gas pipelines and a pipeline conveying toxic or highly volatile fluids, such as liquid petroleum gas (LPG), natural gas liquids (NGL) or ethylene."

The applicant and/or regulatory authority must consider and provide design details and calculations to justify the structural stability and hence the health and safety aspects of the pipeline including the surrounding landscape.

The section of pipelines queried in the further information request, and indeed any other section of pipeline should have been and must be assessed on the basis of structural stability, safety and integrity as there are various uses/work carried out on the surrounding landscape. The Health and Safety authority has a statutory obligation (under the health and safety at work act) to consider the health and safety of people at work. The long-term Health and Safety and people's livelihoods working at home and on the land (Agricultural use, building etc) prior to, during or after any possible failure/explosion event of the pipeline must be considered.

This information should be made available for independent verification. Design standards are often withdrawn or superseded by more stringent requirements. The current safety requirements in current standards will only become more stringent as more and more pipe failures occur. The statutory safety requirement will always be there and will be further enhanced as pipe failures keep occurring and environments and lives damaged and lost. Refer to 'Observation to Applicant's Response' Volume 1 No. 3 of this report for published documented facts.

The text contained in Section 8 of the Department of the Marine and Natural Resources letter dated 15th April 2002 acknowledge that upheaval buckling will occur when it states that

"the proposed measures for mitigating upheaval buckling of the flexible in-field flowlines should be subject to review."

Upheaval buckling is only part of the overall problem associated with this pipeline route. Surrounding ground settlement and movement in any direction mainly lateral and vertical around the pipeline will considerably increase the pipe loading and thus excessive stresses in the wall of the pipe will occur that can cause fractures and ultimate failure of the pipeline. This can occur in an area of natural ground instability close to a major drinking water supply for the entire region. The length of the pipeline that can become unsupported during differential ground movement can increase the shear, longitudinal and bending stresses in the pipeline. When a pipe passes through/supported on adverse ground conditions e.g. waterlogged ground, peat, and mineral soil the likelihood and consequences of differential ground movement and settlement is inevitable.

The applicant specifically states in Section 4.5.1 of the EIS report;

*"that **minimal** differential movement of the ground **is essential** because*

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- *for **safety** and operability, particularly for equipment operating under high pressure, piping and equipment require very tight tolerances on differential settlement.*

- *Piperacks, **piping** and equipment design and installation would be very complex in a plant subject to differential settlement.*

- *excessive settlement would create operability difficulties for equipment such as pumps, turbines and compressors*

The highly compressible and variable characteristics of the surrounding landscape (peat, mineral soil) surrounded in an area of natural ground instability places this pipeline at great risk.

The highly flammable liquid transported in the pipeline under pressure creates forces at bends, junctions, valves and all restrictions to, and changes in, direction of flow.
Additional transient forces may be generated by pump starts or stops, valve closures etc. The vector analysis arising from high-pressure fluid in the pipeline must be resolved and hence the pipeline effectively supported.

BS 8010: Part 1 Section 1.4 'Insurance' states that;

"Promoters should ensure that there is adequate third party insurance in force during design, installation and subsequent operation of pipelines."

The published CIRIA Report 164 states that the *HSE data for the period 1980-1990 showed that of some 600 incidents world-wide there were 128 incidents in the UK involving gas, including both fuel gases such as LPG and chemical gases such as chlorine. The major incident in the UK was the Piper Alpha disaster in 1990 in which 167 people were killed as a result of an explosion of LPG. Incidents have occurred as a result of the transfer of gas in pipelines, the build up of gas in sewers and natural gas accumulation in buildings (e.g Abbeystead)*

I request that the applicant and/or regulatory authority submit/provide details and design calculations for the structural stability of the high pressure pipeline taking account that it is sited in an area of natural ground instability surrounded in blanket bog and its failure could destabilise the ground even more. Further more since this pipeline is within an establishment a proper HSA zoning should be applied to the pipeline, identifying safety and risks to each zone.

The applicant has submitted the design calculations for the site drainage but has not provided sufficient details to demonstrate how the pipeline will be adequately supported. How does the applicant intend to support and stabilise the foul and surface water pipe network and prevent from excessive settlement, back fall and ultimate failure? Is the pipe network going to be piled and supported on beams? Bearing in mind that both networks will contain harmful contaminated substances.

The structural design, installation, operation, performance and safety of all pipelines supported on and surrounded in an area of natural ground instability should be adequately indemnified and collateral warranties given from each relevant regulatory authority and project member. The pipelines and any other element should not fail for the life of the structure, as the consequences of such can be dramatic.

This information should be publicly available and independently verified. Otherwise the application should be refused.
The applicant and regulatory/local authorities must justify and be aware of the consequences of their intended objectives and decisions.

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Section 2.2 in the EIS report states that the terminal is designed to throughput of 10 million cubic meters per day (350 million standard cubic feet per day).

Offshore Technology Website indicated that well tests have confirmed a flow rate of 60 million ft^3/day. Six wells are intended to operate at first. This is comparable to the 350 million standard cubic feet per day quoted in the applicant's submission. Offshore Technology Website states that the reserves in the Corrib field are around One trillion ft^3.

Taking account of the 10 million cubic meters per day and on the basis that 'volume in' equates to 'volume out' then the speed of flow through a 508mm diameter pipeline with a 25.4mm wall thickness will be a whooping
c. 2,500km/hr two thousand five hundred kilometres per hour.

We are all aware of how difficult it is to restrain and support a fire fighting hose, what will restrain this high-pressure pipeline? The blanket bog certainly will not.

Further Information Request Volume 1 No. 3
Proposals for system of collection and storage of any pumped water containing deleterious substances, including concrete, separate from

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the surface drainage network and settlement ponds and to provide for its safe disposal.

Observation to Applicants Response
Grouting for Ground Engineering CIRIA C514. 2000 indicates and outlines the risk assessment and environmental impact assessment of grouting.

It states that

'it is an offence under the Water Resources Act, 1991 to cause or knowingly permit any poisonous, noxious or polluting matter or any solid waste matter to enter any controlled waters. Failure to comply with the above Act may lead to a criminal prosecution. Lacks of intent or negligence are no defence. In addition, expensive civil law suits may follow if harm is caused to someone else's person or property.
December 1997 the Environmental Agency had no defined policy on groundwater pollution caused by grouting in the ground.

It also states; *that any environmental impact assessment and especially the decision about admissible limits should be based on two largely independent investigations.'*

There should be an independent assessment made by an accredited body (with adequate PI insurance) as to the potential consequences arising from this method of construction. The EPA, WHO, Agrément Board bodies, should also confirm their acceptance.

This response should also deal with the safe collection and disposal of 'fire fighting' water. In the event of a fire, bunds around tanks can fill with fire fighting water and reach capacity prior to tank failure; the tank containing the dangerous substance can fail either during or after a fire thus there will be no containment volume for the dangerous substance. The applicant must identify a solution to this potential problem. Settlement ponds will not remove dissolved solids or chemicals in water. Containment bunds containing fire-fighting water will provide less storage volume for the dangerous substance.

The table below extracted from CIRIA Report 164 summarises the causes of loss of containment of liquids, which occurred at one large chemical complex in NW England. There were a 170 such incidents at the complex over a three-year period.

The cause of these incidents is listed below;

Transfer of materials through on-site pipework	37%
Failure of Storage Tanks	7%
Tankers (loading and off-loading)	7%
Compressor / oil bowsers	6%
Valves	5%
Pumps	2%
Other plant and Equipment	7%
Human Error	10%
Miscellaneous	19%

Note: the high percentage of pipe failures, storage tank failures and human errors. The risks of equipment failure alone associated with this development are very high and to further enhance these risks it is sited on poor ground, in natural ground instability, the only inland 8km upstream pipeline in the world, surrounded in blanket bog covered in heather, rush and forest that can quite easily ignite in the expected prolonged dry weather periods.

There are other onshore sites available that do not pose these risks.

The application should therefore be refused.

Further Information Request Volume 1 No. 5
Full details for the proposed sewage disposal system, including any water-table and percolation tests and the design of a suitably sized percolation area.

Observation to Applicants Response
The applicant response to this request states

"*the site investigation indicated that there is a perched water table in the peat and that the peat is relatively impermeable*"

This was also evident last Friday (26th March 2004) when local residents went to investigate and walk the land. The whole area was waterlogged and it was almost impossible to walk the site as people were sinking to there knees in the peat.

A soil percolation test at the location of the proposed puraflo modules / percolation area must be carried out as the effluent from the treatment system will only pond on the peat surface. This is not acceptable or adequate by any standard and the applicant's response to this request is inadequate. We are all aware how long it takes water to percolate through peat (weeks and even months).

Further Information Request Volume 1 No. 6
Submit a map outlining phosphate hot-spots, quantities of contaminated material, details of the analysis of the occasional occurrence of high levels of phosphorous detected in peat samples on the site and proposals to deal with the same including disposal. The format of the response shall include a comparison between

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the total concentration (above background levels), that may theoretically, result from the development works and other land use activities that regularly occur in the area e.g. afforestation, clearfelling etc.

Observation to Applicants Response
The applicant indicates that numerous phosphorous soil sample points were located throughout the site. The maximum reported orthophosphate concentration was 219mg/l at a specific location but generally the concentrations were below 50mg/l in a zone close to the surface. They have stated that orthophosphate concentrations decrease significantly with depth and at greater depths (5.1m) decreased below 5mg/l.

The applicant has stated that the maximum limit for orthophosphate in river waters is 0.05-0.07mg/l and 0.02-0.05mg/l in lake waters. This implies that test results have indicated that orthophosphate concentrations in the blanket bog is approximately 250-10,000 times greater than the allowable concentration in lake waters.

It is imperative to realise that peat consists of approximately 90-95% moisture content (by weight) and now we are informed of its high phosphorus concentrations.

The applicant has stated on Volume 1 Item 6 Page 2 that

"Orthophosphate impact to surface watercourses from phosphate-impacted soils is widely recognised as being a major concern in certain parts of Ireland, because it can lead to eutrophication of lakes and rivers. The principal migration pathway via which orthophosphate typically impacts surface watercourses is via surface runoff."

The applicant once again ignores his own advice and proposes to perform work that will increase the risk of water contamination. The proposed works to the highly saturated and highly concentrated phosphorus blanket bog (containing 405million litres of acidic water) to place it in windrows and to deposit it at the Srahmore site following many mechanically loading, moving and unloading operations is dramatically increasing the surface area of the peat and thus allowing free water containing high concentrations of phosphorous to escape into the surface water streams, rivers, ponds and Carrowmore Lake via *surface runoff.*

The proposed blanket bog operations are;

excavating blanket bog to remove it from its current position at the terminal site,

loading to transport it to windrows at the terminal site,
transport it to the windrows at the terminal site
unloading to form windrows at the terminal site,
moved into windrows at the terminal site,

loaded again to be transported to Srahmore,
transported c. 11km to Srahmore
unloaded again at the Srahmore Site

loaded onto Bord Na Mona **Haku trailer**
transported to the final depositon site at Srahmore
unloaded at the final deposition site at Srahmore

and finally **compacted** at the deposition site at Srahmore. The compaction alone will cause water to escape.

The proposed [loading, transport, unloading] peat operations occurs at least three times, coupled with this is mechanically moving and compacting operations.

This sequence of operations is certainly not acceptable when one considers that there are alternatively sites available without any peat excavation or disposal requirements and outside the catchment area of a major drinking water supply for the entire Erris region. Water will continue to fall-on and escape from the peat when it is placed at the deposition site at Srahmore, (located to the south of Carrowmore Lake). The deposited peat will eventually absorb water thus reducing the shear strength and can ultimately cause peat failure. Remember the applicant has previously clamed that peat slopes can fail at angles of two degrees and above and their proposal have identified that water reduction is necessary for deposition of peat at the Srahmore site. Peatlands that have remained in place for thousands of years have failed, What make this site any different? Shear planes (2 degree and above) could occur within the main body of the peat.

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Further Information Request Volume 1 No. 9 and Volume 2 No. 7
Information and proposals to address the possible impacts of free water from excavated peat on water quality, including PH and loading of humic and other acids.

An assessment of the impact of mineral soil being overlain on the existing peat soil.

Observation to Applicants Response
This observation also comments on information submitted by the applicant in relation to

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Request for further information Volume 2; Items 7.

The content of the applicant's response to these items are misleading. On the afternoon of the 26th of March 2004 at approximately 5:00pm representatives from the Leenamore and Ballinaboy residents group and representatives from Shell walked the proposed gas terminal site. It was obvious to all that walked the site on that day that it was completely waterlogged and extremely soft sometimes people sinking to their knees in soft peat. It was reported that one of Shells representatives actually turned back as the conditions were so bad. Worked had commenced on site without providing any obvious protection/prevention of water pollution. It has been reported that, on site Shell's representative were informed of this and did not provide any evidence to demonstrate otherwise.

How then can the applicant suggest that the site is well drained? It may be well drained but the drains are not drying/draining the peat. The statement '*well-drained nature of the peat*' is misleading as this site visit suggested otherwise.

Bord Na Móna involvement with peat through the years is dealing with milled peat i.e. they effectively scrape the top 10-15mm from the surface and put it into windrows.



Source Bord Na Móna Website www.bnm.ie



Source Bord Na Móna Website www.bnm.ie

The dust like peat particles blow in the wind while this work is been carried out. This process or the works and any mitigation measures carried out during this process should not be compared with the removal of approx 450,000m3 of saturated blanket bog at Ballinaboy.



Source Bord Na Móna Website www.bnm.ie

This process and the main work carried out by Bord Na Móna is better compared to harvesting crops than removing saturated blanket bog. Comparing such process, works and mitigation measures is somewhat worrying and is an indication of the lack of knowledge in this area.

The applicant has already pointed out that water will escape from the blanket bog when it is excavated etc. Windrowing of the blanket bog will only affect the immediate surface of the windrowed peat. The impermeable nature of the blanket bog with its low voids ratio (unlike milled dust like peat) will not allow air to pass through the windrowed blanket bog and thus air drying is not effective. The blanket bog at low depth is inevitably in its virgin state. I welcome an on-site demonstration at Ballinaboy to prove different.

Bord Na Mona shows and states on their website that Peat cut with a hand held slane (winning) has a moisture content of 95%. This is after the bank of turf has been exposed to the elements for a full year. This is stated on http://www.ipcc.ie/cbwinning.html. How can they qualify then that windrows of blanket bog mainly in its virgin state will result in an effective reduction of the moisture content.

The Bord Na Móna submitted documentation contained in Volume 2 Item 7 is questionable for the following reasons.

- It is obvious from last Fridays site visit that the drainage system in place is not sufficient.
- Bord Na Mona has indicated that restoration of the drainage system is required implying that the existing drainage system is insufficient and hence the poor conditions experienced at last Fridays site visit.
- Blanket Bog below the invert levels of the drains should be considered to be in its virigin state and hence greater moisture content is expected.
- The water table was reported to be high

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- They state that the free water in the peat drains away rapidly. Isn't the blanket bog very impermeable with very little voids?

- They have indicated that "depending on the prevailing weather condition such windrowing could lower the moisture content of the peat to approximately 80% over 8 days but would typically achieve 82-87%.

- The intended bulldozing and compaction of the peat will increase the risk of contaminated water escaping from peat and will increase the oxidation of the peat thus contradicting the statement made by the Applicant in Volume 2; Item 3 that "Nitrogen is reduced to Ammonia rather than oxidised to Nitrate" It is no wonder the second paragraph in Volume 2; Item 3 begins with the uncertainty statement that "It is not expected that the level of Ammoniacal Nitrogen will increase..". The submission requires more reassurance than that.

The industrial field trials should be observed and reported by an independent accredited body with adequate PI insurance, independent to companies involved with this application as the consequences of their report could have an overwhelming effect on the quality of water and surrounding environment. Evidence from the photographs (taken during this trial and submitted in the content of the applicants response) shows that this (one-off not independently verified test trial) was carried out in very good (sun shinning, blue sky) weather conditions.

The applicant states without technical support that

" the settlement ponds will provide a more than adequate buffer for any minor differences between the quality of the water released from the peat, and that present in the drains from other sources."

The quality of water in the drains at present is from surface water runoff and should not be compared to acidic water contained in the peat. Organic fibres arising from the disturbed peat may take many months to settle. Therefore, the capacity of the settlement ponds and the detention/attenuation time required is directly related to the suspended solid characteristics in the water and the rate at which they settle.
Settlement ponds will not remove any dissolved solids.

Sudden surges from heavy rainfall will also disturb the settled solids. How does the applicant intend to cater for these events?
In the interest of the health and safety and for the control and monitoring of water quality I request that water sampling and testing should be undertaken by an approved independent testing authority not linked to the applicant. This water sampling and testing should be carried over a period of months to obtain an effective baseline existing water quality in the drains etc.

There are other alternatives available to the applicant that does not unearth such vast quantities of saturated blanket bog, containing up to 10,000 times the allowable quantities of pollutants in lake waters, posing a high risk to the water quality and surrounding environment.

For this and many other reasons, I request that a refusal to this application be granted.

Further Information Request Volume 1 No. 11

Information on the possible impacts on water quality, aquatic ecology and surrounding peatlands arising from the use of the highly alkaline lime/cement binder to comparatively small parts of the site. The information should include technical information and assessments to support the use and appropriateness of this method of peat improvement in this location.

Observation to Applicants Response
Construction work resulting in the injection of chemicals into the ground where surface water run-off will flow into rivers and streams and then into a major drinking water supply for the entire region should undoubtedly be avoided.

In the interest of protecting a major drinking water supply for the entire region, there should be an independent certificate of approval to demonstrate (Agrement Cert or a Cert from the WHO or EPA) that the proposed method of construction including the cement binder to improve the load bearing capacity of the peat will not affect the quality of the water. If this is not forthcoming then this method of construction should be avoided.

It is noted in CIRIA C514. 2000 'Grouting for Ground Engineering' was not part of the applicant research references. This document indicates and outlines the risk assessment and environmental impact assessment of grouting.

It states that

'it is an offence under the Water Resources Act, 1991 to cause or knowingly permit any poisonous, noxious or polluting matter or any solid waste matter to enter any controlled waters. Failure to comply with the above Act may lead to a criminal prosecution. Lacks of

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intent or negligence are no defence. In addition, expensive civil law suits may follow if harm is caused to someone else's person or property.
At December 1997 the Environmental Agency had no defined policy on groundwater pollution caused by grouting in the ground.

It also states *that*

'any environmental impact assessment and especially the decision about admissible limits should be based on two largely independent investigations.'

It is inconceivable to think that the applicants 'Mitigation Measures' to prevent the escape of a leachate is done by blocking drains. *Can you imagine on site someone saying, 'there goes the leachate lets block the drain!' Oh hang on, its about to rain!*

Without prejudice, RSK ENSR general notes states that where any data supplied by the client or from other sources have been used it has been assumed that this information is correct. Where field investigations have been carried out these have been restricted to a level of detail required to achieve the stated objectives of the work. There are too many assumptions and restrictions in order to achieve their client's objectives in their response.

I therefore request that the recommendations made in the CIRIA document be adhered too and that two independent investigations be carried out for the grouting proposal. This proposed method of construction should have an approved accredited status for this particular environment.
The attitude of the applicant to block drains is absolutely ridiculous. What happens in the event of heavy rainfall? What happens when grouting occurs below the invert level of the drain?

Based on the current submitted information and without independent verification of the impacts of this proposed method of construction, I request that this application be refused as there are other construction alternatives available including sites the will not require this construction technique.

Further Information Request Volume 1 No 13.
Investigation of the feasibility of only allowing surface water which is actively pumped from the site entering the settlement ponds and ensuring that site drainage during construction is a totally pro-active hydrometric process rather that a semi passive one. (Parameter would involve setting a maximum allowable output flow rate from the site and in the event that this flow rate is exceeded, flooding of the site is the end result, rather that dealing with the risk of overloading of the settlement ponds.)

Observation to Applicants Response
Certainly the surface water runoff to the settlement ponds should be limited to ensure that they perform their intended function. Turbulence in the settlement/silt ponds should be eliminated. A surcharge of water (high flow of water) entering the settlement/silt ponds will cause turbulence and an imbalance in the settlement pond and hence the solids will become suspended in the water.
Remember the applicant has submitted information to show that c. 2.25mm of rainfall caused an increase of flow from 25 l/s to 275 l/s within a couple of hours. This is a very low rainfall event and would occupy almost 1000m^3 in one hour.
An intense rainfall event could be 40-60mm of rainfall in one hour. The specific gravity of the suspended substances will vary and therefore the time taken for them to settle will vary. Any extreme event and its consequences should be accommodated and resolved within the site boundaries.

For this reason the response to this request is insufficient and therefore this application should be refused, as construction methods exist that will prevent this from occurring. Alternatively there are other sites available in less sensitive areas.

Further Information Request Volume 1 No 15.
A data history setting out the hydrological dynamics of the site to date. In particular the relationships between rainfall events, flows in perimeter drains and levels of phosphates and suspended solids.

Observation to Applicants Response
The applicant's response to item No. 15 states that phosphate levels have not been continuously measured even though it has been quoted by the applicant in FI Volume 1; Item 6 page 2 that

"Orthophosphate impact to surface watercourses from phosphate-impacted soils is widely recognised as being a major concern in certain parts of Ireland, because it can lead to eutrophication of lakes and rivers."

I am sure that this part of Ireland is no different!

Also, the applicant has not qualified the type of suspended solids, some solids will settle quicker than others and the settlement ponds must be designed to accommodate the settlement of all types of suspended solids not

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just silt alone. Otherwise the chemically rich suspended solids will escape into the streams and rivers and hence into Carrowmore lake.

The complete excavation and operations carried out thereafter to unearth a huge volume of saturated blanket bog in a relatively deep and confined area cannot be compared to work already carried out by Bord na Mona. This work will unleash an abundance of organic material with high concentrations of containments into the water; some of it will remain in suspension for a long time while other materials (roots, timber, heather fibrous material etc.) will float on the surface of the water. Sudden surcharges of rainfall will also affect the settled solids.

The expected surcharge of water flow from only 2.25mm of rainfall is evident. FI request Volume 1: Item 15 Figure 1a shows that a c 2.25mm of rainfall caused a sudden surcharge flow of 275 l/s in drain 22 within a two hour period. This indicates a very quick high flow response arising from a rainfall event, which ultimately can disturb the settled solids.

Further Information Request Volume 1 No 16.
Proposals to deal with the storage of peat on site in the event of adverse weather conditions preventing sufficient de-watering of the peat to allow transportation to the deposition site.

Observation to Applicants Response
Dewatering of blanket bog covered with waterproofing sheeting cannot be compared to the dewatering process usually carried out by Bord Na Mona. The loose powder like material harvested by Bord Na Mona with a high degree of voids allows any moisture to percolate through the milled peat thus allowing it to dry shed water and hence effectively dry.
This will not happen with the windrowed insitu blanket bog, as there are little or not voids in peat hence its low permeability. Furthermore, any waterproofing sheeting will need to be anchored down tight to the peat surface further preventing water drying of the blanket bog.
It is insufficient and impractical to suggest that the windrowed blanket bog will be covered every time it rains. Is the peat going to be covered if a small shower of rain comes along? If its not going to be covered then the water content will increase etc etc. The covers on Bord Na Mona milled peat are usually on for months at a time.

The applicant has now identified that the proposed process of removing the peat is weather dependent.

Therefore, the applicant's response and proposal is insufficient, impractical as it could take many months and even years to remove this peat in order to meet the criteria put forward by the applicant.

It is imperative to remember that the peat will contain in excess of 405,000,000 litres (four hundred and five million litres) of acidic water with high concentrations of phosphorus.
This is not acceptable as the peat contains high levels of chemicals that will undoubtedly escape into the surface water streams and rivers and eventually into Carrowmore lake thus affecting water quality.

It is for these reasons also that I request that this application be refused. There are other sites available that do not require the excavation, removal and high risks that are associated with such large volumes of peat removal.

THIS IS SIMPLY THE WRONG SITE FOR THIS PROJECT.

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Submission regarding Further Information on Ref. No. P03/3343

School of Health Science,
GMIT,
Westport Road,
Castlebar,
Co. Mayo.

MAYO CO. COUNCIL
RECEIVED
30 MAR 2004
PLANNING & DEVELOPMENT

30.03.04

Dear Mr. Douglas,

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I wish to make two comments regarding the Further Information submitted by Shell E. & P.

1. In outlining the regulatory regime for the upstream pipeline (i.e. from Glengad to Bellanaboy) the applicant fails to make reference to the various above-ground structures that will be required. For instance, will there be a small reception facility required at landfall as had been indicated in the previous application? Will there be above-ground structures required along the pipeline route? Will there be a requirement for temporary roads in order to gain access to the pipeline? In the event of any of these being the case, then planning permission will be required. If these are indeed planned, the present application has failed to make reference to them and would therefore be incomplete. This important point would need to be determined before you arrive at your decision.
2. Perhaps the most important technical undertaking proposed by the applicant is the safe removal and deposition of 450,000 cubic metres of peat. In support of the viability and safety of doing this, the applicant has furnished a six page Report from Bord na Mona. This Report is so extraordinarily inadequate and amateurish that it borders on the humorous. It in no way can constitute an adequate pre-

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planning study of an enormously complex engineering undertaking. A number of aspects can be briefly noted:

2.1 It makes no reference to any precedent for this undertaking.

2.2 It makes no reference to any desk-top survey of peat removals, experiences in handling peat, or prevailing scientific knowledge of the behaviour of cut peat.

2.3 It makes no reference to the wealth of hydro-geological data presented by the applicant at the previously conducted oral hearings.

2.4 It fails to include anecdotal and local knowledge regarding peat in the area.

2.5 It is not signed by any scientist.

2.6 It has not been peer reviewed by any scientific body.

2.7 It reports the 'results' of three facile experiments and declares this 'proof' of the proposed peat removal methodology. The results of three crude tests do not, in any regard, constitute 'proof'. There is a complete failure to understand, and hence apply, the most basic scientific method.

2.8 The three tests outlined are not supported by a comprehensive scientific methodology. In one case they rely on 'visual inspection' and declare results as 'favourable'. In all cases they fail to indicate the depth from which the peat was extracted; the moisture content of that peat; the moisture content following the test. There is no independent verification of the procedures employed; no pre-test statements of criteria; no presentation of tests done on other sites for comparability purposes or for scientific control purposes.

2.9 The conclusion reached in the final line of the Report amounts to an assertion – *it has not been scientifically established.* That Bord na Mona could apparently stand over such a Report is embarrassing from a body of their reputation.

In summary, this Report could not possibly serve as a testing of the proposed peat removal undertaking. Indeed, the Report definitively establishes the extraordinary lack of understanding the applicant has of the properties of peat in the area. Once again, the applicant has presented a general conceptualisation of how peat will be removed but this is not anywhere near the detail required in a planning application.

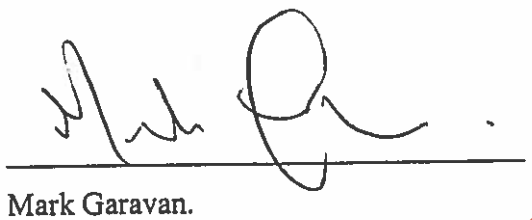
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The precautionary principle must apply. It is demonstrably unsafe to entrust the applicant to this operation and planning permission must accordingly be refused.

There are a great number of additional concerns with the applicant's further information. These can await the likely consideration by An Bord Pleanala of this application. The further information provided fails to establish the planning appropriateness or general viability of the proposal.

Yours sincerely,



Mark Garavan.

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Mayo Co. Council
Planning authority

MAYO COUNTY COUNCIL
RECEIVED
29 MAR 2004
PLANNING & DEVELOPMENT

Ballinaboy
Barnatra
Ballina
Co. Mayo
29-3-04

Dear Sir.

In regard to the further information (Ref: po3 / 3343) submitted by Shell E&P Ireland to the planning authority concerning the Ballinaboy Bridge gas terminal and associated Srahmore peat deposihon site I make the following submission on behalf of my family and the Ballinaboy / leenamore residents.

(1) With regard to the huge amount of lorries, road widenings , the main route L1204 to Castlebar general hospital will become impossible to travel. As a parent of an asthmatic child. I am not looking forward to been delayed behind a convoy of lorries or delayed by bridge building or other road works. Should my child be rushed to Castlebar hospital following a serious asthma attack as has happened already. This is also the experience of other residents regarding other serious illness and serious accidents. I assure you Mr Douglas a woman in child labour finds it difficult and extremely painful travelling from Ballinaboy to Castlebar general hospital under normal circumstances (As it's a 45 mile journey) without having to endure delays that have been put in place to facilitate Shell and residents will also have major problems in gaining access to their properties with lorries passing every minute.

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(2) In regard to road widenings Shell once more assumes that landowners will allow their private land to be used to facilitate their works without having approached the landowners or is C.P.O the way they intend to go. (Look at drawing 2044-1000).

(3) With regard to flag men been situated at our driveway at junction R314 and L1204 12 hours a day my family and I feel this is an invasion of our privacy and also worry for our children's welfare concerning strangers. This junction is also a bus stop for our local secondary school's students.

(4) Each resident as his or her own timetable or we now expected to take a new timetable to suit a minibus driver.

(5) With regard to drawing 2044 –1005 indication of barrier for 40m to both sides of the bridge structure (Barrier: concrete? steel? or what?) my husband and I feel that this will cause flooding to our property should the level of this road be altered by barriers or associated works.

On September the 19th 2003 this section of road where the proposed barriers are intended for was impassable due to the Ballinaboy Bridge been unable to take the flow of water. Gardaí blocked the road. My family and I sat in our home that night with two Gardaí should we need to be evacuated as the existing flood was 2ft

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away from our side door. Not a very pleasant experience .If the road was a little higher and the barrier in place on that night our home would have been swamped.

(6) From reading the risk assessment the residents believe that Bord Na Mona and Mayo Co. Council are to take responsibility for everything and anything and Shell take on little or no responsibility should things go belly up.

On a final note where in the further information submitted by Shell do they answer your question pipeline stability in bog. I cannot find the answer or is it a case of passing the book over to the Department of Marine.
During a recent visit to the site (Facilitated by shell) residents were informed that it is around 12m in depth from the ground to bedrock in south west corner of site. This forms no part of the answer you received to item No.2 by Shell.

At this stage I would like to state that the Ballinaboy/Leenamore residents have no confidence in Shell's ability to carry out this proposed development safely as their methods seems to be mostly experimental.
We are asking the planning authority to take our genuine concerns on board and refuse planning permission for the Ballinaboy bridge gas terminal.

Yours Sincerely
Mio Jacinta Healy

On behalf of the Ballinaboy/Leenamore residents.

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29 MAR 2004
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Rathmichael Lodge,
Shankill,
Co. Dublin

The Planning Officer,
Mayo County Council,
Castlebar,
Co. Mayo.

Your Ref P03/3343

26th March 2004

Re: Shell Ireland - Corrib Project
and relating Bord na Mona peat disposition at Shrawnea

Dear Sir/Madam,

Thank you for your letter dated 16th March 2004, in which further details of the proposed developments are given. My original submission centred on the effects of the developments on the water quality in Carrowmore lake and in the Owenmore and Munhin rivers, & the adequacy of the plans to ensure that the water quality in the lake and the rivers is not impaired and also the necessity to have all barricades, filters, settling ponds etc fully in place on site before any work on the terminal or the disposition takes place. I also proposed that an independant outside agency (or Mayo Co. Council) should be a requirement to report:-

a) That all the required water quality work is in place, prior to the main work starting
b) On a regular (daily during the depositioning?) basis that the flow of water/liquid into the lake and rivers is of a satisfactory standard.

I have to say that the additional information which was contained in your letter greatly increased my concerns on the ~~loss~~ potential damage to the Fishery. It pinpoints for example (all with potential damage to the water) the provision of:-

- Maintenance building
- Mechanical workshop
- Welding and other ~~work~~ shops
- A maintenance vehicle shed.
- A diesel storage tank
- Emergency generator diesel day tank

P.T.O.

cont'd over

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- Heating medium storage tank
- effluent feed / treated water sumps
- A water treatment building
- Effluent feed / treated water sumps
- A sludge treatment facility
- a Road Timber loading / unloading area
- A waste storage area.
- Drainage arrangements for settlement ponds and at Shramore:-
- Construction of internal circulation routes
- " of a Surface water Swale (S.W boundaries)
- Provision of 5 surface water settlement ponds
- Controlled overflow area.
- Oil interceptor.
- Temporary wheelwash.

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Many of the above items are obviously being provided to deal with the water quality aspects (and are therefore to be commended), but their listing does draw attention to the potential dangers, in the event that the precautionary measures are either:-

a) Inadequate, or not properly maintained/monitored
or b) are not in place prior to commencement of the site development / disposition.

I am not ~~as~~ an engineer or technical expert, but trust that Mayo Co. Council will ensure that whatever development is approved, and the conditions attached thereto, fully protect the water quality of the lake and the rivers for the fishery.

Yours faithfully,
J.R.B. Hewat.
JRB HEWAT
GLENALT FISHERY

P.S. I attach the acknowledgment from Mayo Co. Council dated 20/01/2004

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Mayo County Council
Aras An Chontae
Castlebar

Ref No.: P03/3343

20/01/2004

Glenalt Fishing Syndicate
C/O JRB Hewat
Rathmichael Lodge
Shanhill
Co. Dublin

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A Chara

I wish to acknowledge receipt of submission received from you on 20/01/2004 in connection with planning application by **SHELL E & P IRELAND LIMITED for CONSTRUCT GAS TERMINAL FOR THE RECEPTION AND SERAPATION OF GAS FROM THE CORRIB GAS FIELD, AND FOR A PEAT DEPOSITION SITE, RESPECTIVELY. THE DEVELOPMENT WILL CONSIST OF THE CONCURRENT DEVELOPMENT OF TWO SITES LOCATED 11 KILOMETRES APART, APPROXIMATELY, AND IDENTIFIED AS THE SITE OF THE GAS TERMINAL FOR THE RECEPTION AND SEPARATION OF GAS FROM THE CORRIB GAS FIELD IN THE TOWNLAND OF BELLAGELLY SOUTH AND THE SITE OF THE PEAT DEPOSITION SITE IN THE TOWNLANDS OF SRAHMORE AND ATTAVALLY, BANGOR ERRIS. THE DEVELOPMENT AT THE BELLAGELLY SOUTH SITE WILL CONSIST OF: A GAS TERMINAL FOR THE RECEPTION AND SEPARATION OF GAS INCLUDING PLANT AND EQUIPMENT; PROVISION OF 4,935 SQ M (GROSS FLOOR AREA), APPROXIMATELY, OF BUILDINGS; ACCESS ROADS; 40 NO. CAR PARKING SPACES; AND ANCILLARY DEVELOPMENTS, OF WHICH 13 HA, APPROX, WILL BE DEVELOPED INRESPECT OF THE GAS TERMINAL'S FOOTPRINT. THE PROPOSED DEV. WILL OF THE BELLAGELLY SOUTH SITE WILL ALSO CONSIST OF; THE EXCAVATION AND REMOVAL OF 450,000 CUBIC M at BELLAGELLY SOUTH SRAHMORE ATTAVALLY.**

The matters referred to by you will be taken into consideration by the Council before a decision is made on the application. Notice of the Council's decision on the

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application will be given in accordance with the requirements of the Planning and Development Regulations, 2001. This may be in the form of:

(a) posting the notice directly to you; or

(b) publishing the notice in a newspaper circulating in the area where the proposed development is situated.

I enclose herewith Receipt. **Please note that in the event of an appeal being lodged by you, An Bord Pleanala will require a copy of this letter of acknowledgement.**

Mise, le meas

RUNAI CHONDAE

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Monica Muller
Rossport
Ballina
Co. Mayo
Tel 097 88011
Email: monicamuller@eircom.net

Mayo County Council
The Mall
Castlebar
Co. Mayo

MAYO CO. COUNCIL
RECEIVED
29 MAR 2004
PLANNING

Monday, 29 March 2004

Submission to 03 / 3343 planning application, request for further information

Dear Sir / Madam,

I submit that the developer has not complied with the requested further information.

- The developer did NOT include the consent documents in the further information, the "Dear Brian letter" has no legal standing.
  The developer did not address the question "*that the design of the proposed gas pipelines ...is suitable to ensure the structural stability of the pipeline constructed in deep peat soil.*" I attach a letter from the Marine Licence Vetting Committee, which refers to an onshore gas pipeline report commissioned by the Department for (then) Marine and Natural Resources as part of the EIA process and justification for the onshore upstream gas pipeline. The report makes no reference to 'deep peat' or indeed any soil type and associated issues and no assessment appears to have been carried out regarding construction in deep peat soil.
  The developer has denied Mayo County Council the information contained in that report and indeed has not submitted the report.

  The developer did NOT include the Compulsory Acquisition Orders for the wayleave of upstream (incoming) gas pipeline.

- It is worth pointing out that in relation to traffic, it would appear that one of the condition (listed in the letter) and presumably in the consent document (not submitted) to build the pipeline is: condition 19. *"Construction traffic management shall be such as to avoid peak hours and particularly those hours when children will be likely to be going to or from school."*
  The traffic management plan as submitted by the developer ignores that condition and intending to endanger public safety.

- An EIS shall contain all likely significant impacts generated by the development, direct and indirect, and has to propose mitigating measures.

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The statement by the developer that the road chosen for the peat haulage and all other traffic generated by the project is the responsibility of Mayo County Council, does not excuse the developer from responsibility to list all direct and indirect likely impacts on the environment, in particular on SACs in the EIS.

- The developers opinion that the project will "encroach slightly" on Carrowmore SAC is avoiding the fact that the road is part of the SAC. The developer's opinion of the SAC is irrelevant being not the authority to decide on the designation of SACs.

- Noise
  The further information makes no reference to vibration impacts by the generated traffic on local family homes. There appear to have been no tests conducted of the impact of such an amount of HGVs on the stability of local houses or farm buildings or indeed on the local water supply pipeline which is running parallel to the road L 1204.

- Cumulative impacts
  The developer has failed to provide a listing of the cumulative traffic related to the project, i.e. building of gas refinery, peat depository area, transport and construction of down stream and upstream gas pipelines, waste disposal to not stated reception locations other than peat slurry.

- The developer is project splitting which is not allowable under current legislation by isolating the building of the gas refinery and peat depository area from the building of the two gas pipeline not only associated with the project but not sustainable without such. As far as the assessment of cumulative impacts go, the gas pipelines don't seem to exist.

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Yours sincerely,
Monica Muller

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MARINE LICENCE VETTING COMMITTEE
Meetings: Marine Institute Laboratory
Abbotstown Laboratory Complex
Snugboro Road
Dublin 15
Correspondence: c/o Coastal Zone Administration Division
Dept. of the Marine and Natural Resources
Leeson Lane
Dublin 2

Ms. Monica Muller
Rossport
Ballina
Co. Mayo

May 31, 2002

Dear Ms. Muller

I acknowledge receipt of your letter of 24th May 2002.

Safety aspects of the proposed development were addressed by the Department of the Marine and Natural Resources itself and not directly by the MLVC.

I refer you to the MLVC report (Paragraph 6.2.2.2, page 22) which states that:

The MLVC understands that the Minister has commissioned a study in relation to the onshore section of the pipeline system proposed by the developer to establish that the selection of the relevant design codes and standards is accordance with best public safety considerations and is in accordance with best national and international industry practice and specifications.

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I have copied your request for information to the Petroleum Affairs Division of the Department of the Marine and Natural Resources and I understand that a reply has issued today, 31st May, which includes a copy of a report entitled "Evaluation of Onshore Pipeline Design Code.

Yours sincerely

Dr. Terry McMahon
Chairman
Marine Licence Vetting Committee

03/3343

Permanent members: Dr. Terry McMahon, Marine Institute, (Chair); Dr. Francis O'Beirne, Marine Institute; Dr. Trevor Champ, Central Fisheries Board; Mr Mick O'Driscoll, Senior Sea Fisheries Officer, Department of the Marine and Natural Resources; Captain Tom O'Callaghan, Marine Survey Officer, Department of the Marine and Natural Resources; Mr Allen Williams, Engineering Division, Department of the Marine and Natural Resources

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Mayo County Council
Aras An Chontae
Castlebar

Ref No.: P03/3343

06/01/2004

Ms. Monica Muller
Rossport
Ballina
Co. Mayo

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A Chara

I wish to acknowledge receipt of submission received from you on 02/01/2004 in connection with planning application by SHELL E & P IRELAND LIMITED for CONSTRUCT GAS TERMINAL FOR THE RECEPTION AND SERAPATION OF GAS FROM THE CORRIB GAS FIELD, AND FOR A PEAT DEPOSITION SITE, RESPECTIVELY. THE DEVELOPMENT WILL CONSIST OF THE CONCURRENT DEVELOPMENT OF TWO SITES LOCATED 11 KILOMETRES APART, APPROXIMATELY, AND IDENTIFIED AS THE SITE OF THE GAS TERMINAL FOR THE RECEPTION AND SEPARATION OF GAS FROM THE CORRIB GAS FIELD IN THE TOWNLAND OF BELLAGELLY SOUTH AND THE SITE OF THE PEAT DEPOSITION SITE IN THE TOWNLANDS OF SRAHMORE AND ATTAVALLY, BANGOR ERRIS. THE DEVELOPMENT AT THE BELLAGELLY SOUTH SITE WILL CONSIST OF: A GAS TERMINAL FOR THE RECEPTION AND SEPARATION OF GAS INCLUDING PLANT AND EQUIPMENT; PROVISION OF 4,935 SQ M (GROSS FLOOR AREA), APPROXIMATELY, OF BUILDINGS; ACCESS ROADS; 40 NO. CAR PARKING SPACES; AND ANCILLARY DEVELOPMENTS, OF WHICH 13 HA, APPROX, WILL BE DEVELOPED INRESPECT OF THE GAS TERMINAL'S FOOTPRINT. THE PROPOSED DEV. WILL OF THE BELLAGELLY SOUTH SITE WILL ALSO CONSIST OF; THE EXCAVATION AND REMOVAL OF 450,000 CUBIC M at BELLAGELLY SOUTH SRAHMORE ATTAVALLY.

The matters referred to by you will be taken into consideration by the Council before a decision is made on the application. Notice of the Council's decision on the

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application will be given in accordance with the requirements of the Planning and Development Regulations, 2001. This may be in the form of:

(a) posting the notice directly to you; or

(b) publishing the notice in a newspaper circulating in the area where the proposed development is situated.

I enclose herewith Receipt. **Please note that in the event of an appeal being lodged by you, An Bord Pleanala will require a copy of this letter of acknowledgement.**

Mise, le meas

RUNAI CHONDAE

ANNING DEPARTMENT
MAYO COUNTY COUNCIL
ARAS AN CHONTAE
CASTLEBAR
CO. MAYO
094-24444

06-01-2004 15:42:42

Receipt No. : PLAN/0/6005

MONICA MULLER
ROSSPORT
BALLINA
CO. MAYO

MISC RECEIPTS - PLANNING 40001
9J TO P03/3343

Total 20.00 EUR
15.75 IEP

Tendered:
Cash 20.00

Issued By : Orla Burns
From: PLANNING SECTION

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An Roinn Cumarsáide,
Mara agus Acmhainní Nádúrtha
Baile Átha Cliath 2.

Department of Communications,
Marine and Natural Resources
Dublin 2.

16 March 2004

Your ref: P03/3343
Our ref: C17/7/55

M Moore
For County Secretary
Planning and Development Section
Mayo County Council
Aras an Chontae
Castlebar
Co Mayo

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Re: Planning Permission

Dear Sir/Madam

I wish to acknowledge receipt of your correspondence regarding the above.

I have forwarded your letter and enclosures to Mr Vincent Roche, Chief Executive Officer, North Western Regional Fisheries Board, Abbey Street, Ballina, Co Mayo for appropriate attention and direct reply.

Yours sincerely

Claire Byrne
Inland Fisheries, Marine Leisure
and Research Division

Leeson Lane, Dublin 2
Lána Chill Mochargáin
Baile Átha Cliath 2

Telephone: +353 1 678 2000
LoCall 1890 44 99 00
Fax: +353 1 678 2449

email: contact@dcmnr.gov.ie
GTN +1 13

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Eamon RYAN TD

Spokesperson on Transport

Spokesperson on Enterprise, Trade & Employment

Spokesperson on Communications, Marine & Natural Resources

Dáil Éireann
Kildare Street
Dublin 2
Ireland

T 01 618 3097
F 01 618 4363
M 086 829 4429
E eamon.ryan@oireachtas.ie
W www.eamonryan.ie

GREEN PARTY
Comhaontas Glas

DUBLIN SOUTH CONSTITUENCY

Mr Iain Douglas
Mayo County Council
Planning Department
The Mall
Castlebar
Co Mayo

6530
€20 cash
30/1/04

30th January 2004

Dear Mr Douglas

I hope that you will be able to accept a submission I wish to make on the revised planning application by Shell EP Ireland Ltd for the development of a Gas processing terminal in Bellanaboy Co Mayo. Ref PO3/~~3353~~ 3343

I have several concerns regarding the development of the terminal at the site particularly:

The safety problems that may result from the operation of the upstream pipe line which I believe runs for some 9km from Pollatomish to the terminal site.

The possible environmental effect of the transfer of the surface peat from the site to other bog sites in the area and the effect of the development on the nearby lakes and river systems.

The failure by the company to consider other alternative locations for the terminal such as the site of the former Assahi plant near Killala, given the shorter upstream pipe line that would be required in this location and the suitability of the site given its former use for heavy industrial activity.

The effect of discharges from the facility particularly on the sensitive marine environments in Sruwaddacon and Broadhaven Bays.

I hope that Mayo County Council will take my views into account when considering the application and that on this occasion you decide to refuse the application.

I look forward to hearing back from you should you want any further details regarding our position.

Yours sincerely

Eamon Ryan TD

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DR. T.K. WHITAKER,
148 STILLORGAN ROAD,
DUBLIN 4.

30th January, 2004

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Dear Dr. Whitaker,

I wish to acknowledge receipt of your letter of 26th January 2004 in connection with the application of Shell for planning permission for the Corrib Project.

The points raised in your letter are noted and will be taken into consideration in the processing of the planning application.

Yours sincerely,

D. Mahon,
COUNTY MANAGER.

c.c. **Planning Office/**



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North Western Regional Fisheries Board

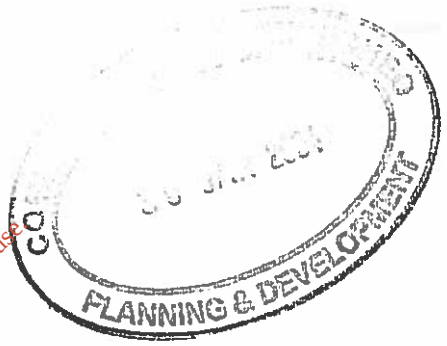
Bord Iascaigh Réigiúnach an Iarthuaiscirt

Fisheries Ireland

Our Natural Heritage

29 Jan, 2004

Secretary
Planning Section
Mayo County Council
Aras an Chontae
Castlebar



Re: **P03/3343 – Corrib Gas Project**

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Dear Secretary

With reference to your request for the Board's views on the above project, I now enclose herewith a submission which sets out our comments in relation to this application.

Yours sincerely

VINCENT ROCHE
Chief Executive Officer

mcc-corgas14



The North Western Regional
Fisheries Board
Ardnaree House
Abbey Street
Ballina
Co. Mayo
T: (096) 22788
F: (096) 70543
E: info@nwrfb.com
W: www.nwfisheries.ie

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THE NORTH WESTERN REGIONAL FISHERIES BOARD

Submission to Mayo Co. Council re P03/3343 - Corrib Gas Project

With regard to the recent EIS and planning application, submitted in respect of the proposed Bellanaboy Bridge Gas Terminal and associated Srahmore Peat Deposition Site, the Board has the following submission to make.

1. The Owenmore River System

The proposed sites for both the gas terminal and the peat repository are located in the Owenmore River catchment. The Owenmore River/Carrowmore Lake system is a very important on in terms of its fisheries resource. The system holds highly valuable stocks of salmon and trout as well as other species such as lampreys. It is an important producer of salmon for both commercial fishermen and anglers. For example, there are twenty-five licensed drifts fished along the coast of the Bangor fisheries District with a further twenty-five draft nets fishing on Tullaghan Bay. Approximately 125 fishermen are engaged in salmon fishing during the salmon season (mid-May-end July) Salmon and sea trout angling is now a major tourism attraction in the area with anglers coming from all over Ireland and abroad to fish on Carrowmore Lake and the Owenmore River. These visitors provide a major boost to the local economy from March right through to the end of September. The importance of the Owenmore is reflected in the fact that the Board, in association with a committee of stakeholders, has recently produced a major fisheries management plan for the system (at present being printed).

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2. Potential threats to the Fisheries Resource.

a) The proposed development is on a huge scale and has the potential to cause massive damage to the environment if it is not subjected to very stringent planning conditions and managed with extreme care.

b) The excavation and removal of such a huge quantity of peat from the construction site could result in serious pollution of waters in that area which drains into Carrowmore Lake, a very important fishery and source of water supply for the Erris area.

c) The transportation of the peat to Bangor and its deposition on a Bord na Mona cutaway bog also has the potential to cause pollution of the Munhin River, which drains Carrowmore Lake, and the lower Owenmore River.

d) The company's proposal to inject large quantities of cement and lime into some areas of peat at Bellanaboy, in order to strengthen its load bearing capacity, is also a cause of concern given the potential of these materials to pollute waters.

COMHAIRLE CHONTAE MHAIGHEO
30 JAN 2004
PLANNING

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e) Carrowmore Lake has suffered from eutrophication in recent years and a persistent algal bloom wiped out the angling on the lake in 2003 resulting in a major loss to the local economy. The Board is anxious to ensure that the construction works do not result in discharges of phosphorous to the lake as this would add to the eutrophication problem.

f) The Board has concerns about the treatment and disposal of wastewater from the Bellanaboy site during construction and post completion of the terminal.

g) While it is not the subject of the planning application the Board is particularly concerned about the possible impact of the effluent which is to be piped back out to Broadhaven Bay from the terminal when it becomes operational. While the Board is aware that the company has a licence from the Minister for the Marine, and that it will also require an IPC licence from the EPA, both the Board and the local fishermen are concerned about possible damage to the ecology and fish life of the bay arising from the discharge.

3. Silt control Measures

The Board has had a number of discussions with representatives of Shell, Bord na Mona and their advisors in relation to the need for measures to prevent discharges of peat silt from both the construction site and the repository site at Bangor. The proposals now contained in the EIS reflect these discussions. Subject to effective management during the works, we believe that the measures now proposed will minimise the potential for discharges of silt. The effective management and maintenance of silt ponds and other facilities is, however, crucial and stringent conditions in this regard should be included in any grant of permission. C ontrary to what is suggested in the EIS, there has been serious pollution of waters, over many years, caused by peat silt emanating from poorly managed silt control facilities on Bord na Mona bogs. These are only now in the process of complying with an IPC licence issued to the company by the EPA in recent years. While it is accepted that the Bord na Mona silt problem was caused mainly by milled peat, a serious threat also arises in this case due to the vast quantity of raw peat that is to be excavated, moved by road and deposited.

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4. Cement/Lime Binder Application

The company proposes to add large volumes of binder (36,000 tonnes of lime/cement) in order to strengthen the load bearing capacity of the peat. The EIS has correctly identified the potential for lime/cement binder to leach into the surface/groundwater. Various measures have been suggested in the EIS that will mitigate any impact on the receiving environment. The "*moat*" type drains, constructed to collect any leached binder, may require emptying on occasion e.g. when a new phase of the development is to commence. The surface drainage network and settlement ponds are not suitable for this purpose. The Board also wishes to highlight the enormous quantities of concrete to be used in the development. Again, it may be necessary to pump drains, or other holding areas that may contain leached concrete products, as various activities proceed during the construction phase. The potential for ecological damage from the discharge of such material into watercourses is obvious but the EIS does not

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deal adequately with this threat. The developer should be required to provide a storage facility, or portable tank, for the collection of any pumped water containing deleterious substances, including concrete, and to provide for its safe disposal.

5. Treatment and Disposal of Wastewater

The location of the septic tank, the puraflow unit and the percolation area, in relation to adjacent watercourses, could not be easily discerned from the maps in the EIS. A general location was extrapolated from the material supplied and it appears that the sewage treatment system is not located beside any sensitive watercourse. However, the developer should be required to provide a map indicating the location of the system in relation to the Bellanaboy River, the Leanamore Stream and any tributary of the Glenamoy River. Although the Board understands that the discharge from this system will be dealt with under the IPC licence, the location and suitability of effluent control facilities are primarily matters for Mayo Co. Council as the Planning Authority. Essentially, this involves a waste disposal system discharging on to a blanket bog site and it is important that facilities are suitable and adequate. The Board is of the opinion that conditions, providing for regular inspection and an annual service contract, are essential to prevent the contamination of adjacent watercourses.

Wastewater arising during the construction phase, which is likely to be of a significant quantity, is to be collected and taken off site by tanker. The Co. Council should ensure that effluent collection, storage and disposal facilities are suitable and adequate for the volumes that may arise during construction.

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6. Eutrophication of Carrowmore Lake

1) As Mayo Co. Council is aware, Carrowmore Lake suffered a prolonged and dense algal bloom during 2003, which resulted in the closure of the fishery with substantial loss to the local economy and concerns regarding possible affects on the local drinking water supply. This algal bloom probably occurred as a result of the mineralisation of phosphorous from benthic sediments during a period of stratification of the water column. Investigations, currently being carried out by the Board in partnership with Mayo Co. Co. and the EPA are ongoing. It is obvious that the lake is highly sensitive from a nutrient perspective. Any activity in the catchment that may result in the mobilisation of large quantities of phosphorous, possibly resulting in an increase in nutrient loading to the lake, would be detrimental.

2) The Board has been informed, at a recent meeting with the developer, that occasional high levels of phosphorous were detected in peat samples on the site. We understand that these arise from agricultural research activities on the site in the past. The EIS states that they are not considered a likely significant threat to watercourses in the area; however, the results of the analysis have not been provided. The Board feels that in the interests of clarity, the developer should be requested to provide details of the analysis results. The format of the response may also enable the developer to provide a comparison between the total concentrations (above background levels), that may, theoretically, result from the development works and other land use activities that regularly

TAE MAYO CO
30 JAN 2004
PLANNING & DEVELOPMENT

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occur in the area e.g. afforestation, clearfelling etc. The Board does not contend that the site of the proposed development has high levels of phosphorous that would result in any damage to water quality in adjacent watercourses. However, it seeks reassurance on this point and believes the developer should be asked to provide further information in this regard.

7. Inaccuracies in the EIS

Vol. 1 EIS – 7-2 (Aquatic Habitats)

Reference to electro fishing operations undertaken in the "*Ballina Fishery Area*", has been made in a number of instances. The Board wishes to point out that these operations were undertaken in the Glenamoy and Owenmore catchments, in **Bangor Fisheries District** in the North Western Fisheries Region. Reference to the "*Ballina Fishery Area*" should be substituted in order to avoid confusion as this reference does not have any basis in statute or otherwise.

Vol. 1 EIS – 7-2 (Aquatic Habitats in the wider area)

The existence of heavy silt deposits in watercourses examined, has, in the Board's opinion, been exaggerated. Also, the identification of overgrazing as the sole land use activity contributing to silt deposition is incorrect and misleading.

Vol. 1 EIS – 7-2 (Fish)

A number of false conclusions, inconsistent with the consultant's reports and the actual situation in these watercourses, are evident in a number of statements in this section of the EIS. The Board's information is that juvenile salmonid densities are consistent with that naturally expected from this habitat class. A number of locations, electro fished in 2003 by the company, have yielded high densities of a lamprey species, above previously recorded and expected numbers. It is incorrect, therefore, to say that "*lampreys were scarce in all sampling locations*. Reference is also made to coarse fish and coarse fish angling in the EIS. This is unnecessary as there are no coarse fish present in this area generally and any reference to them should be removed to avoid confusion.

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Vol. 2 EIS – 7.3.2.1 (Munhin River)

The actual contribution of the Munhin River to the production of salmonids in the catchment generally, is unknown. It may be incorrect to say that it does not contribute significantly to the overall production. The EIS correctly identifies that the proposed deposition area is located below any spawning or nursery habitat and, therefore, the site is not particularly sensitive in that regard. However, the Munhin River is very significant in that it provides habitat for resident trout and for migrating salmon and sea trout.

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Other Watercourses –Vol. 1 of EIS

The Aquatic Ecology section, in Volume 1 of the EIS, gives the impression that the watercourses adjacent to the proposed development area are more ecologically impaired than is actually the case. The Bellanaboy River, although experiencing increased anthropogenic and damaging affects in recent years, remains a significant contributor to salmonid density and biodiversity in Carrowmore Lake. Also, this river is notable for the very high numbers of lampreys recorded in 2003.

8. Suggested Conditions if permission is granted

1) If permission is to granted for this proposed development, it is essential that stringent conditions are imposed in order to protect the environment. The type of conditions which the Board considers necessary will be obvious from the above. In general, the Board would favour the inclusion of conditions similar to those contained in the Council's previous decision in relation to this proposed development but taking account of the changes in plans on this occasion, particularly having regard to the transportation and deposition of a massive quantity of peat at Bangor. The conditions in relation to completion of the baseline salmonid survey, the monitoring requirements and the setting up of a monitoring group to oversee the development, must also be included, as part of any decision to grant permission. The Board considers that conditions 10, 18, 19, 20, 21, 22, 24, 25, 26, 27, 28, 29, 30, 31, 32 and 53, in the original schedule of conditions, are essential in this regard.

2) In relation to condition 10 of the previous decision, however, we consider it necessary that, in addition to the baseline survey, which should be carried out before any works commence, follow-up surveys should be carried in the years during the construction phase and in the year following completion of the development. We believe this is necessary in order to monitor any possible adverse effects arising from the development. The waters to be surveyed should be agreed with the Board and with the Marine Institute and should include those that could now be affected by the Bangor peat repository. In relation to this matter, the Board has organised a meeting with the developer for Thursday, 12 February at 2:30pm at the Board's headquarters in Ardnaree House, Abbey St., Ballina. The Marine Institute will be in attendance and a representative from Mayo Co. Council is also welcome to attend.

3) Regarding section 26 of the previous decision, there may be some overlap between the requirements for a comprehensive ongoing salmonid surveys and this monitoring requirement, including agreement on the list of the parameters to be analysed. To avoid repetition and undue cost to the developer from these requirements, the Board should be adequately informed, in advance, of any agreement on monitoring of the aquatic environment which is to be undertaken on foot a any planning decision.

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4) In relation to condition 53 of the previous decision, we would ask the Council to require that the developer would also notify a designated Fisheries Board Officer in the event of any accident, malfunction or other occurance which would be likely to result in pollution of waters so that any action required on the Board's part could be taken without delay.

I Roche

Vincent Roche
Chief Executive Officer

28 January, 2004

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COMHAIRLE CHONTAE ÁTHA CLIATH
30 JAN 2004
PLANNING & DEVELOPMENT

EPA Export 08-07-2014:23:49:38



Eamon RYAN TD

Spokesperson on Transport

Spokesperson on Enterprise, Trade & Employment

Spokesperson on Communications, Marine & Natural Resources

Dáil Éireann
Kildare Street
Dublin 2
Ireland

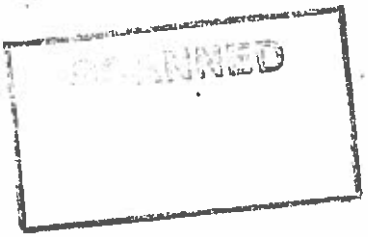
T 01 618 3097
F 01 618 4363
M 086 829 4429
E eamon.ryan@oireachtas.ie
W www.eamonryan.ie

GREEN PARTY
Comhaontas Glas

DUBLIN SOUTH CONSTITUENCY

FAX MESSAGE

TO: Mayo County Council
Planning Department
ATTN: Iain Douglas
FROM: Eamon Ryan
DATE: 30th January 2004



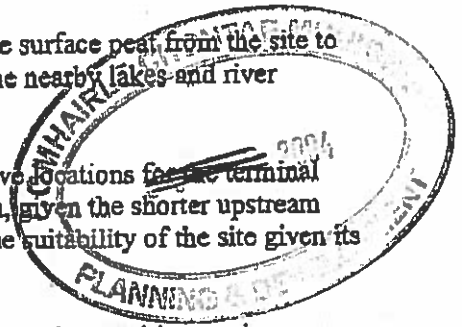
Dear Mr Douglas

I hope that you will be able to accept a submission I wish to make on the revised planning application by Shell EP Ireland Ltd for the development of a Gas processing terminal in Bellanaboy Co Mayo. Ref PO3/3353

I have several concerns regarding the development of the terminal at the site particularly:

The safety problems that may result from the operation of the upstream pipe line which I believe runs for some 9km from Pollatomish to the terminal site.

The possible environmental effect of the transfer of the surface peat from the site to other bog sites and the effect of the development on the nearby lakes and river systems.



The failure by the company to consider other alternative locations for the terminal such as the site of the former Assahi plant near Killala, given the shorter upstream pipe line that would be required in this location and the suitability of the site given its former use for heavy industrial activity.

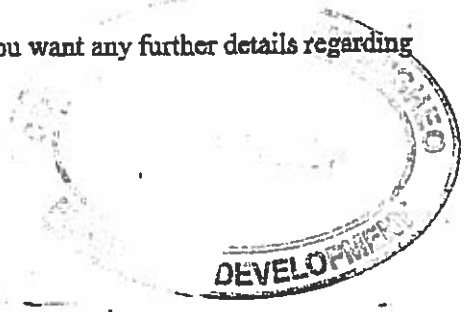
The effect of discharges from the facility particularly on the sensitive marine environements in Sruwaddacon and Broadhaven Bays.

I hope that Mayo County Council will take my views into account when considering the application and that on this occasion you decide to refuse the application.

I look forward to hearing back from you should you want any further details regarding our position.

Yours sincerely

Eamon Ryan TD



P.S. I have arranged for my submission and a €80 fee to be sent directly to your Castlebar offices this afternoon, which I trust you will be able to accept

Eamon Ryan

Páipéar Athchúrsáilte

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Glenamoy Community Angling Association

6523
€20 cash
30/1/04

Glenamoy,
Ballina,
Co-Mayo

29/01/04

Ref No P03 /3343

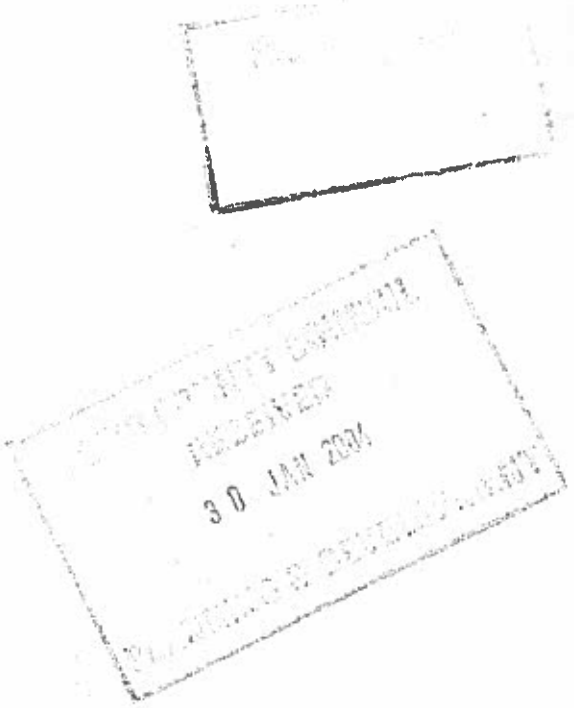
To the Planning Office Mayo County Council,

The above Angling Association fully endorses and supports the application made by Shell Exploration & Production Limited, for the construction of a Gas Processing Plant at Ballinaboy. We believe that all of the necessary prerequisites and implications are fully explored, so we as a local Angling Club fully support this application.

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Mise le Meas

Michael Healy
Club Secretary



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Coiste Forbartha Ceathrú Thaidhg / Ros Dumhach

Carrowtigue/Rossport Development Committee

6521
€20 cash
30/1/04

Rossport,
Ballina,
Co-Mayo.

29/01/04

Ref No P03 / 3343

To the Planning Office Mayo County Council,

On behalf of the above Committee, I wish to state that we are satisfied that this new application by Shell Exploration & Production Limited for a Gas Processing Station to be constructed at Ballinaboy, Barnatra, Ballina, Co-Mayo, meets all the prerequisites for such a venture. We fully support this very worthwhile project

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30 JAN 2004
PLANNING & DEVELOPMENT

Mise le Meas

Michéal Ó hEalaithe

Chairperson
Coiste Forbartha Ceathrú Thaidhg / Ros Dumhach

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James Deane

T·R·A·N·S·P·O·R·T

V.A.T. No.: IE 33468280

CORCLOUGH WEST, BELMULLET, COUNTY MAYO, IRELAND.
TEL.: 097 - 81128 FAX: 097 - 81123 E-mail: deanetransport@eircom.net

6520
€20 cash
30/1/'04

Mr Ian Douglas,
Planning Dept.,
Mayo County Council,
Castlebar.

29.01.2004

Planning ref: PO/3343

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Dear Sir,

I would like to lend my support to the application by Shell E&P Ireland, for the development of the Corrib Gas Project.

I think it would be a great economic boost to the entire North Mayo region, and to the country at large.

I hope Mayo County Council will view this project in a positive light.
I enclose 20.00 Euro fee.

Yours faithfully,

James Deane

30 JAN 2004

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6517
€20 cash
30/1/94

17 Rossport South
Ballina
Co Mayo
097-88865.

Ref. No P03/3343.

Propesol to construct a gas Terminal at Ballina Bay.

I am putting in my Submission that I have lots of Concern about this gas Terminal. and espically the Road that they will be Useing from Ballina Bay To Bangor Ericis the delay in Traffic.

my FATHER is a very sick man and suffer from Cardic failure and needs Ambulance to Bring him to Castlebar Hospital every Four Weeks. How Long will it Take for [redacted] ambulance To get to his house and then to Castlebar Hospital.

My Concern is also about our Health and Safety of our Lives. and also the clean air we had. we will no longer have.

I disagree with this Terminal Build in Ballina Bay when it should Be Build on Sea.

[redacted]. Signed. Maureen McGrath.
Philip McGrath.

MAYO COUNTY COUNCIL
RECEIVED
30 JAN 2004
PLANNING & DEVELOPMENT

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6516
€20 cash
30/1/04

Rossport South,
Ballina,
Co. Mayo.
26 January 2004.

Mayo County Council,
Planning Office,
The Mall,
Castlebar,
Co. Mayo.

03/3343

MAYO COUNTY COUNCIL
RECEIVED
30 JAN 2004
PLANNING & DEVELOPMENT

Objection Submission: Re **Shell Exploration & Production.**

Dear Sir / Madam,

I am writing to you in reference to the planning application submitted by Shell Exploration & Production for a gas refinery at Bellanaboy. Having read the EIS submitted with the planning application I have noticed it is more theoretically based as opposed to factually or practically based.

One of the main consequences of the removal of peat is the serious pollution it will cause to the surrounding waters. These are namely the Glenamoy Bog complex (Sruth Fada Conn Bay, Carramore Lake, and Broadhaven Bay) which are in close proximity to the proposed development site.

The removal of 450,000 tonnes approximately of peat from the site in Bellanaboy, which will then be loaded into trucks, transported to the deposition site at Srahmore, Bangor situated 10 kilometers away, and offloaded there and spread on cutaway bog site seems to create more problems than it solves.

The method in which they intend doing this is based on the ***observational method***, which seems to have been employed throughout the EIS.

Furthermore the route of the proposed pipeline carrying raw gas and other impurities at 150bar pressure in such close proximity to myself and my family's home is a huge underlying threat. As this has not been tried in any other country, I feel it is purely experimental and the Health and Safety risks to the residents along the route have not been addressed. There are safer options available, for example, a suitable site, cleaning at source etc, etc.

Please understand we are not against the Corrib gas coming ashore but the way in which at present it is being proposed.

To highlight our fears and concerns, I refer you to An Bord Pleanala's decision on this matter.

Yours sincerely,

Brendan Philbin.

Brendan Philbin

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6545
€20 cash
30/1/04

Submission
in Respect of

Proposed Bellanaboy Bridge Gas Terminal, Bellagelly South, Co. Mayo & Associated Peat Deposition Site at Srahmore and Attavally, Bangor, Co. Mayo.

Planning Ref. P03/3343

MAYO COUNTY COUNCIL
RECEIVED
30 JAN 2004
PLANNING & DEVELOPMENT

The Glenmore Syndicate wishes to lodge its concerns with Regard to the development detailed within the EIS accompanying the Application for Planning Permission Ref. P03/3343

The area of Concern focuses on water quality with subsequent adverse effects on fish life in the Muinhin River, the Owenmore River and Carrowmore Lake.

for and on behalf of
The Glenmore Syndicate.

€20.00 enclosed.

MICHAEL VARIAN.
DANGAN COTTAGE, THOMASTOWN, CO. KILKENNY

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Connacht Gold
Co-operative Society Ltd

Tubbercurry, Co. Sligo, Ireland
[illegible]
Tel: 071 9185200 Fax: 071 9185239

Our Ref: MF/MB

6548
€20 cash
30/1/04

30 January 2004

Shell Ireland Gas Terminal
Reference No. P033343

Fax: 094 9021694

Submission from Connacht Gold Co-operative Society Limited

Consent of copyright owner required for any other use.
For inspection purposes only.

Connacht Gold Co-operative Society Limited with thirty business units throughout the province of Connacht and South Donegal wishes to support the application of shell Ireland for its proposed gas terminal.

As a major energy user Connacht Gold is currently at a substantial disadvantage to all of its competitors in the rest of Ireland due to the fact that they can avail of a natural gas supply.

In the context of the Government's commitment to balanced regional development our region must have equity in the availability of energy and especially as we already suffer the economic disadvantages of peripherality and other inferior infrastructure.

Accordingly we fully support the proposal to provide the proposed gas terminal at Bellanaboy Bridge, Co. Mayo.

Yours faithfully

Michael Farrell
Chief Executive.

[illegible] COUNTY COUNCIL
RECEIVED
30 JAN 2004
PLANNING & DEVELOPMENT

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Building Contractor
Doolough
Geesala
Ballina
Co. Mayo.
Tel / Fax 097 86750
e-mail: naughtonbldrs@eircom.net

Vincent Naughton
Building Contractor

HOMEBOND
member

28 January 2004

Mayo County Council
Planning Section
Aras an Chondae
Castlebar
Co Mayo

Re: PO3/3343 Proposed Gas Terminal at Ballinaboy

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For inspection purposes only.

Dear Sir/Madam,

With regard to the above project, as both a business person and an individual I would like to express my support for the proposed Gas Terminal. It would be a economic boost for the area directly, not to mention the knock on effect such a project inevitably generates.

I urge the planning section to grant planning permission and to make every effort to overcome any difficulties arising from objections.

Yours sincerely

Vincent Naughton

Rec 6539
€20 –
30.1.04

EPA Export 08-07-2014:23:49:38

An Phríomh Shráid,
Béal an Mhuirthead,
Co. Mhaigh Eo.
Teil/Facs: 097 20977
Ríomhphost: errischamber@eircom.net

Cumann Trádála Iorras

Erris Chamber of Commerce

Main Street,
Belmullet,
Co. Mayo
Tel/Fax: 097 20977
Email: errischamber@eircom.net

Mayo County Council
Planning Section
The Mall
Castlebar.

The Erris Chamber of Commerce
Main St,
Belmullet
Co. Mayo

26th January 2004

Ref: Planning Application P03/3343

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Dear Sir/Madam,

The Erris Chamber of Commerce would like to show their support for the above project. The Chamber feel that this project can and will benefit the Erris region in many ways.

The first benefit will be derived from the employment given in the construction of the terminal and the service industry which will support the construction. This in turn will create the confidence for future investment in the area, which will bring further employment to a region that has been static for a number of years.

It will also create full time positions when the plant is in full production, plus the added services to the terminal, i.e. maintenance etc.

The Erris region has not benefited from outside investment over the past number of years and we feel should this project not become a reality it will send out a signal that the Erris area is a no go area as far as economic growth is concerned.

We have every confidence in Mayo County Council its staff and the experts involved in the decision making of the above project that it will yield a positive decision to ensure your future the future of the Erris region and indeed the County.

Yours faithfully

PP Nuala Noone
Pat Cowman

R10 . 6538
€20
30/1/04

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BELCROSS ENTERPRISES

Specialist in Plant Haulage 3-6 Ton HIAB Service Available
Plus General Haulage 10-38 Ton
Civil Engineering Contractors

Emlybeg South, Binghamstown, Ballina, Co. Mayo
Tel: 097 81849 Mobile: 086 803 1099

28 January 2004

Mayo County Council
Planning Section
Aras an Chondae
Castlebar
Co Mayo

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Re: PO3/3343 Proposed Gas Terminal at Ballinaboy

Dear Sir/Madam,

I would like to express my support for the above project and to express my hope that the Council will grant planning permission. This project would generate much needed revenue and development in the area. The effort of overcoming any objections is minimal compared to the overall benefits of such a project.

It is unlikely that such an opportunity for development will present itself in this area again and I feel it is imperative that the opportunity is not lost.

Yours sincerely

Patrick Cowman
Belcross Enterprises Ltd

E20 30/1/04
PO - 6537

EPA Export 08-07-2014:23:49:38

ONTRAC ENGINEERING LTD

GEESALA
BALLINA
CO.MAYO
IRELAND

TELE : 097 – 86868 / 86969
FAX : 097-86855
Email : ontracengineering@eircom.net

81-82 NORTH STRAND ROAD
DUBLIN 3
IRELAND

TELE : 01-836-5522
FAX : 01-8551234

Planning Section,
Ground Floor,
Mayo County Council,
Aras an Chontae,
The Mall,
Castlebar,
Co. Mayo.

26th. January, 2004.

Rec. 6546
€20 30/1/04.

Ref: P03/3343

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TO WHOM IT MAY CONCERN

Please take note that 'Teach Iorrais Hotel' are in favour of permission been granted for the Gas Terminal Development at Ballinaboy in Erris subject to meeting the necessary enviormental requirements as laid down by the council.

Yours sincerely,

Tom Gaughan,
Director.

SCANNED

VAT REGISTRATION : 6325869M

EPA Export 08-07-2014:23:49:38

Teach Iorrais

Geesala
Ballina
Co.Mayo
Ireland
Tele : 097 – 86888
Fax : 097 – 86855
Email : teachlor@iol.ie
Website : TeachIorrais.com

Planning Section,
Ground Floor,
Mayo County Council,
Aras an Chontae,
The Mall,
Castlebar,
Co. Mayo.

26th. January, 2004.

Ref: P03/3343

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TO WHOM IT MAY CONCERN

Please take note that 'Teach Iorrais Hotel' are in favour of permission been granted for the Gas Terminal Development at Ballinaboy in Erris subject to meeting the necessary enviormental requirements as laid down by the council.

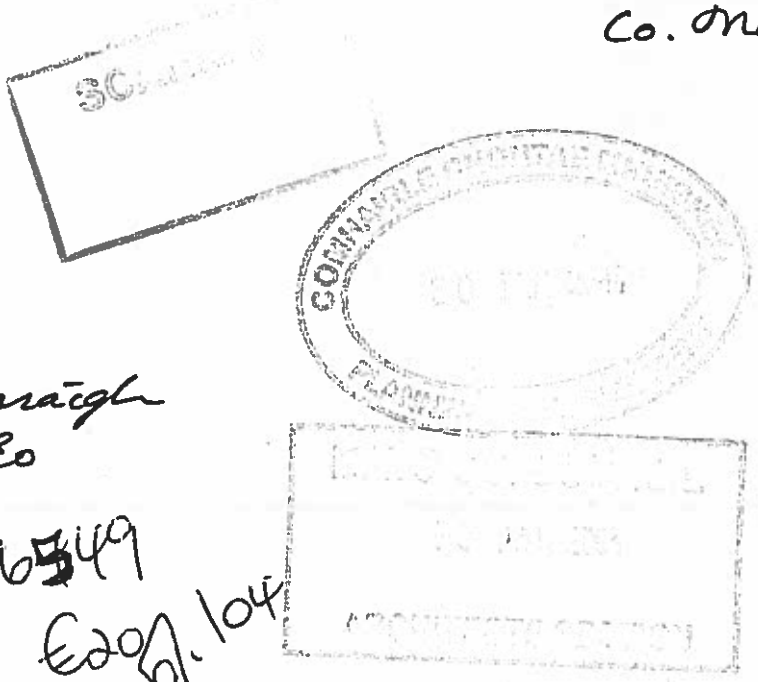
Yours sincerely,

Tom Gaughan,
Director.

Rno 6547 30.1.04
€20

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Sr. na nBeanaic
Béal a' Mhuirthead
Co. Mhaigh Eo



Iain Douglas
Senior Planner
Planning Dept.
Mayo Co. Council
Caisleán a' Bharraigh
Contae Mhaigh Eo

28/1/04

65149

Rec'd 30/1/04

Iain, a chara,

Ref - P03/3343

Please find on record my concerns regarding the above planning application along with enclosed appropriate fee. For clarity, I underline extracts taken directly from the E.I.S.

I am a mother of two small children living within the hinterland of the proposed development. I am duty bound for my childrens' protection and wellbeing and it is on account of that, I write to you.

My concerns centres around the possible effects that the proposed development could have on Carrowmore Lake which supplies water for the main reservoir in Ballina, North Mayo. I am also concerned at the lack of a detailed Emergency Response Plan in the E.I.S..

Carrowmore Lake is situated less than 1 km. from the intended Terminal site and 'the terminal ground slopes away from the South West and runoff flows from the Terminal into Carrowmore Lake' (section 9.2.3) 'Most water from the site flows into the South and South West boundary ditch', 'the lake is located to the South West of the Terminal Site. 'The drains on the Terminal footprint (size 13 ha - section 2.1 or size 11 ha - section 2.3 flows into the Bellanboy river and its tributaries which then flows into Carrowmore Lake.' 'the surface gradient and surface drains over the Terminal footprint falls towards the South West and so surface flow is in this direction. (section 9.2.3).

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I am afraid that the Terminal because of its precarious and dubious location has a high probability of contamination to the groundwater which flows into Carrarmore Lake, the results of which may detrimentally adversely and perhaps tragically affect our main water supply. The scant information in relation to the groundwater Protection measures provided by the E.I.S has not allayed these fears.

Furthermore and in conclusion, there is insufficient information provided in the E.I.S in relation to one of the most important if not the most important aspect to the development and that is the Emergency Response Plan.

I trust you will take my concerns into consideration.

Is mise le meas,

Máire NicCharthaigh

MÁIRE NICCHARTHAIGH.

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Mayo County Council
Aras An Chontae
Castlebar

Ref No.: P03/3343

30/01/2004

Mr Mark Garavan
School of Health Science
GMIT
Westport Road
Castlebar, Co. Mayo

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A Chara

I wish to acknowledge receipt of submission received from you on 29/01/2004 in connection with planning application by SHELL E & P IRELAND LIMITED for CONSTRUCT GAS TERMINAL FOR THE RECEPTION AND SERAPATION OF GAS FROM THE CORRIB GAS FIELD, AND FOR A PEAT DEPOSITION SITE, RESPECTIVELY. THE DEVELOPMENT WILL CONSIST OF THE CONCURRENT DEVELOPMENT OF TWO SITES LOCATED 11 KILOMETRES APART, APPROXIMATELY, AND IDENTIFIED AS THE SITE OF THE GAS TERMINAL FOR THE RECEPTION AND SEPARATION OF GAS FROM THE CORRIB GAS FIELD IN THE TOWNLAND OF BELLAGELLY SOUTH AND THE SITE OF THE PEAT DEPOSITION SITE IN THE TOWNLANDS OF SRAHMORE AND ATTAVALLY, BANGOR ERRIS. THE DEVELOPMENT AT THE BELLAGELLY SOUTH SITE WILL CONSIST OF: A GAS TERMINAL FOR THE RECEPTION AND SEPARATION OF GAS INCLUDING PLANT AND EQUIPMENT; PROVISION OF 4,935 SQ M (GROSS FLOOR AREA), APPROXIMATELY, OF BUILDINGS; ACCESS ROADS; 40 NO. CAR PARKING SPACES; AND ANCILLARY DEVELOPMENTS, OF WHICH 13 HA, APPROX, WILL BE DEVELOPED INRESPECT OF THE GAS TERMINAL'S FOOTPRINT. THE PROPOSED DEV. WILL OF THE BELLAGELLY SOUTH SITE WILL ALSO CONSIST OF; THE EXCAVATION AND REMOVAL OF 450,000 CUBIC M at BELLAGELLY SOUTH SRAHMORE ATTAVALLY.

The matters referred to by you will be taken into consideration by the Council before a decision is made on the application. Notice of the Council's decision on the

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application will be given in accordance with the requirements of the Planning and Development Regulations, 2001. This may be in the form of:

(a) posting the notice directly to you; or

(b) publishing the notice in a newspaper circulating in the area where the proposed development is situated.

Please note that in the event of an appeal being lodged by you, An Bord Pleanala will require a copy of this letter of acknowledgement.

Mise, le meas

RUNAI CHONDAE

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ERRIS INSHORE FISHERMEN'S ASSOCIATION

Chairperson - Eamon Ó Duibhir, Corclough West, Belmullet, Co. Mayo - 097 81182
Secretary - Eamon Dixon, Carne Nash, Belmullet, Co. Mayo - 097 81572

Mayo County Council
Planning Office
Áras An Chontae
The Mall
Castlebar
Co. Mayo



Rec 6501
€20
30/1/04

28th January 2004

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Dear Sir/Madam

RE : PLANNING APPLICATION REFERENCE NO. PO3 3343.

We wish to object to the granting of planning permission to the above application reference number from Shell E&P Ireland Ltd, to develop and run a gas processing terminal at Ballinaboy, Glenamoy, Co. Mayo.

We do this because of its potential to damage our environment and to harm irreparably the ecology of Broadhaven Bay - our fishing grounds, to the detriment of our livelihood and our ability to develop and diversify as users of the sea.

As confirmed by your office today, it is sufficient to lodge our intention to object in this letter format and to submit further details later, therefore please be advised that we will present a more detailed submission in the near future.

Enclosed is the relevant fee of €20 to lodge this objection.

Yours faithfully

E. Dixon

EAMON Ó DUIBHIR
Chairperson



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RODERIC O'CONNOR & ASSOCIATES

ROUNDWOOD
CO. WICKLOW
rodericoconnor@eircom.net

SCANNED

Director of Services Planning
Mayo County Council
The Mall
Castlebar
Co. Mayo.

R no 6496
€20
29/1/04

28 January 2004

Re: Planning Application 03/3343

Dear Sir,

I wish to and am instructed by others to make the following observations on the the above mentioned application and the accompanying Environmental Impact Statements.

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The application is invalid as it does not apply for retention and completion of unauthorised developments already undertaken by the applicant and does not otherwise satisfy the requirements of the Planning Acts.

The traffic generated by the building of the proposed development poses an unacceptable risk both to the developers and the public by reason of the nature of the roads. Furthermore the cumulative effects of further ancillary development ie Bord Gais infrastructure have not been considered. The road being used for the transport of peat also goes through the Carrowmore Lake Complex SAC and the proposal is likely to cause significant impact. This requires assessment which has not been done. In addition it is not stated exactly where the rock will be imported from nor to where the waste material will be exported. It is submitted that this comprises a major deficiency in the EIS.

The EIS is fundamentally flawed. It does not provide the data which justifies the decision to choose this particular landfall and consequently fails to provide the rationale for the entire project involving as it does considerable additional expenditure of public monies in providing additional and perhaps unnecessary infrastructure. This also serves to prevent any meaningful consideration of viable alternatives as required by European law.

This proposed development relies on materially affecting an Annex I Priority Habitat and Marine Special Area of Conservation which includes a Special Protected Area for Birds of international importance by providing a waste pipeline and ancillary developments through these areas. As such a development can only be permitted by a decision of the European Commission subject to reasons of overriding national importance and the absence of viable alternatives. A decision to grant by Mayo County Council on the information available would not only be a material contravention, as referred to in the refusal of the previous application,of their own development plan but contrary to both European and Irish Law.

EPA Export 08-07-2014:23:49:39

The development is likely to impact on rivers and bays in the vicinity. These contain protected habitats or species and this has not been adequately assessed in the EIS. The methods of containing and disposing of the peat are contradictory and unworkable in both the EIS.

I enclose twenty Euros.

Yours faithfully,

Roderic O'Connor & Others

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148 Stilloegan Road,
Dublin 4
26 January, 2004

MAYO COUNTY COUNCIL
27 JAN 2004
Co. Manager's Office

The County Manager,
Mayo County Council,
Council Offices,
Castlebar,
Co.Mayo

Dear Manager,

In connexion with the renewed application of Shell for planning permission for the Corrib Project, I wish to bring to your notice the reservations I have expressed to the Company and the assurances I have sought. A copy of my letter of 8 December, 2003 is enclosed.

I also enclose a note of my meeting with Shell representatives on 17 December,2003.

Yours sincerely,

Kenneth Whitaker

T.K.Whitaker

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COMHAIRLE CHONTAE MHUIGHEO
& DEVELOPMENT

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Copy of letter faxed on 22 Jan. 04 as per tel. phone call. Ed. Mor 29/1/04

Chapel Street,
Belmullet.

22nd Jan. 2004.

Mr. Iain Douglas,
Senior Planning Officer,
Mayo County Council.

Dear Mr. Douglas,

Re: **P03/3343 Shell E & P Gas Terminal at Bellanaboy**

Thank you for your letter dated 15th Jan. 2004 together with files omitted from digital version of EIS. Please note that the above description copied from your letter is incorrect in that the facility applied for is a gas cleaning plant, i.e. a refinery.

Regarding a separate aspect, will you please confirm that this current application (PO3/3343) is being treated in all respects as a full and complete application in its own right without reference or dependence on any previous application for the Bellanaboy site?

Also, will you please inform me as to the steps being taken by the Planning Authority of Mayo County Council re commissioning an independent, expert evaluation of the application in respect to its diverse implications as reflected in the wide-ranging EIS.

I make this request in the light of official record of your Planning Section conceding in regard to a similar complex application that it did not have the necessary range of technical expertise within its own staff to evaluate its full implications. It nevertheless proceeded to adjudicate the application and this became a matter of serious concern consequently.

Thanking you for your attention,

Yours faithfully,

Edward Moran

Edward Moran

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€20 cash
30/1/04

Proposed Bellanaboy Bridge Gas Terminal & Associated Peat Deposition Site
Planning Reference P03/3343

It is abundantly clear to me, having read Section 6 Vol. 1 of the EIS prepared in respect of the proposed Bellanaboy Bridge Gas Terminal and associated Srahmore Peat Deposition Site that this documentation is totally inadequate and has failed to deal with the real facts regarding some birds in particular.

Our business is and has been to act as purveyors of field sports and as a conservation body. The Hill and Valley has been in our family for five generations now. We have liased with many international bodies and noted conservationists worldwide. We have monitored/culled vermin, enhanced and protected habitats - this has been our life's work. I have gained from these activities in terms of well-being both for myself and for all.

Our Corporate clients include the Fiat Co. of Italy and associated newspapers; the Law Societies of France, Italy, Belfast and Dublin. We have coached our President, Taoiseach, Ambassadors, Congressmen, 'ordinary' folk together with the rich and famous – which include the Kennedy's of Massachusetts and Richard Branson of Virgin Atlantic. We also continue our education in conservation among the young.

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It must be taken into consideration that the second biggest flight pattern of woodcock in the world, numbering over 1 million birds comes in over Ballinaboy. The birds on this flight pattern populate from mid-Sligo to Galway and all of Counties Mayo, Roscommon and Longford – which area has the highest density of such birds in Ireland and all of Europe.

Without exception, all stately homes from Sligo to Ashford Castle have a documented history going back hundreds of years; these birds initiated the building of many of them. Detailed research – costing £5,000 at the time - on the flight patterns and movements of these birds was carried out 150 years ago by none other than the Guinness family.

The sensitivity of these birds is noted by the learned; there is nothing in this EIS which recognises this fact. Therefore, this can only bring about ecological disaster forever and a day.

I say that as caretakers for future generations nobody has the right to participate in this desecration.

For and on behalf of Hill & Valley Private Gun and Sporting

John E. Coleman, Belass, Foxford, Co. Mayo.

RECEIVED
30 JAN 2004

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Chapel Street,
Belmullet.

29 Jan, 2004

Planning Office,
Mayo Co. Council.

Re: P03/3~~555~~ 031/3343

Dear Sir/Madam,

please find the enclosed Submission on the above file. Cheque for €20 is attached.

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Yours faithfully,

Edward Moran.

Rec 6511
€20 chq
30/1/04

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SUBMISSION: Re: PO3/3353

Background

Interest

For over 25 years we have owned a residential property c.2km downwind from the proposed Ballinaboy gas terminal-cum-refinery. Our immediate concern arises from the c. 45,000 tonnes of emissions into the air which will be borne by the prevailing winds directly over the village where our property lies. Alarmingly, this cluster of 9 residences is ***not*** shown on the ordinance survey-based map accompanying the Planning Application, despite repeated efforts on our part over several years to have this omission rectified by the Applicant. Effectively it has been air-brushed from the record.

Pro-gas

We are unequivocally ***pro***-gas, ***pro***-Erris prosperity, and ***pro***-sustainable development We have witnessed Erris grow and develop over the past 30 years to an extent almost unimaginable at the outset, and we have consistently, if indirectly, supported this development.. However, regarding sustainability we are aware that set-backs have been part of the Erris scene quite as much as its undeniable progress. While optimism regarding major developments is therefore warranted, open and fair acknowledgement of the facts and their implications is essential for all concerned.

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Promises

It would, for instance, be horribly ironic if Corrib gas were to be piped through Erris to fuel prosperity at the far ends of Ireland leaving little benefit in Erris once the short-term (and potentially disruptive) construction phase is finished. Yet, to date, that is the ***only*** certain prospect on offer to Erris. None of the parties involved, neither Shell, Bord Gais nor the Government deny this, though each is willing to intimate that others will deliver the vaguely-promised, longer-term prosperity. The truth is that Shell's interest and commitment ends ***totally*** once the gas has been cleaned and re-pressurised for delivery at Bellanaboy.

Stark Reality

No supply is possible except through a Bord Gais supply network. No supply networks are planned along the proposed pipeline route from Bellanaboy which is designed as a trunk-line straight through to Craughwell, with no spurs guaranteed whatsoever. Additionally, Bord

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Gais is statutorily and specifically prohibited from developing inherently uneconomic supply networks and so, only larger centres of population with substantial industrial bases, would qualify for supply networks. That is why, in the west, Galway city alone is guaranteed to benefit - while Cork and Dublin will be the main beneficiaries - over the 15 year life of Corrib gas.

Root Problem

This need not be the case but it is the only one which the Applicant is willing to consider, largely because it is the cheapest, most convenient option for them. They have been reinforced in this option by Government policy which envisages infra-structural development following on from such an installation. While this is a most attractive prospect there is reason to believe that it is largely wishful thinking of the kind which wins votes at election time but fails the test of closer scrutiny.

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Precedents

Bantry Bay, for instance, did not benefit infra-structurally from the oil terminal based there 30 or so years ago but it did suffer the catastrophic dock-side explosion of the Betelguese oil tanker with the loss of 50 lives, followed by 15 years of clean-up and stagnation. Likewise, the Silvermines development at Tynagh brought little infra-structural development,but it has left a pollution problem which affects the whole locality and for which the development company is unwilling to take responsibility. The list goes on and on....

Long Term Planning

The central fact is that the planning stage is ***a once-off opportunity*** to get things right for **all** vested interests. The most certain benefit for Erris lies in servicing an off-shore platform, as at Kinsale, through the development of sea and heliport facilities from Blacksod and/or Broadhaven. This option was highlighted by An Bord Pleanala in its Section 10 referral. It would guarantee on-going commercial activity and local employment ***over the whole life of the gasfield*** by ensuring a flow-through of workers and supplies, as well as the spin-offs on sea and land which that would entail.

Costs

The Applicant has consistently refused to countenance this option on the basis of extra costs but has failed to provide figures to substantiate this position at any stage, despite having a

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legal responsibility to do so. An Bord Pleanala's Section 10 referral noted specifically this responsibility to provide detailed assessment of alternatives. What is certain is that there is circa 1,000,000,000,000 cu.ft (one trillion) of gas in the field. This has an equivalency of 150,000,000 (150 million) barrels of oil which, in turn, has current market value of circa $4,500,000,000 ($4.5 billion). Since no royalties are to be paid, and no government share of ownership was reserved, nor is any profits tax likely for many years (all exploration, development and running expenses are deductible up-front), it is perfectly reasonable to expect that a solution with on-going benefit to the area is not only affordable but equitable, as was done in The Shetlands, Norway, East Timor etc, etc.

Bottom Line

It must be remembered in this regard that the $4.5 billion of gas actually belonged to the Irish nation (as does all mineral wealth) until it was signed over by our government on payment of circa £5,000 shortly before the Shell takeover of Enterprise. Also, cleaned gas processed off-shore is capable of being readily piped to the national grid without the problem of slug build-ups which otherwise impose many limitations. And the E150,000,000 (150 million Euro) which government-owned Bord Gais is committed to invest for the pipeline to Craughwell could be far better spent in developing off-shore servicing facilities in Erris.

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Repeat

In this light, it must again be emphasised that a facility in Erris servicing an off-shore shallow-water platform would give on-going employment and prosperity ***over the full life of the field*** whereas a terminal-refinery on-shore would merely allow the gas ***to pass through Erris*** to service the cities of Galway, Limerick, Cork and Dublin. Government Ministers and Bord Gais Managing Director have repeatedly acknowledged that there would be relatively little commercial benefit from Corrib gas north of Galway city and it is against this perspective that we wish our submission to be viewed.

<u>Planning Context:</u>

Interpretation

The current Application is an entirely new, independent, 'from-scratch' request for Planning Permission, despite widespread attempts in the media by senior political figures and spokespersons for the Applicant to portray it as having to do with the peat issue only. This

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latter interpretation is very misleading as it chooses to ignore the interim judgement of An Bord Pleanala in June, 2003 and the ***four key issues*** which the'second chance' Section 10 request for fundamental reviews provided.

Section 10 & Final Decision

Both the Section 10 request and ABP's final decision very clearly showed exceptional concern to accommodate government strategic policy in line with its statutory responsibility. In doing so it had to disregard the whole thrust of the 377 page ABP Report which collated the findings arising from the very extensive Appeals process, including the EIS and lengthy Oral Hearings. The conclusions of that report were forthright and unequivocal on each of the four issues raised in the Section 10 request. In opting to discount three of these very substantial issues, ABP showed enormous regard for government strategic policy, yet retained its integrity by a unanimous refusal based on the fourth issue, the peat problem. This issue significantly embodied what was most fundamentally wrong with the Application overall.

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Political Intervention

Political intervention effectively undermined the potency of this unanimous ABP refusal in its immediate aftermath. It was characterised as being based on a mere technical shortcoming. This opened the way for a new application – ***effectively its fourth***. The first Application was found to be so seriously flawed that it was withdrawn before consideration by the Planning Authority. The second Application was granted Permission by the Mayo Planning Authority, despite many submissions highlighting fundamental omissions, inadequacies and defects. A third opportunity was, most unusually, provided to the Applicant by An Bord Pleanala issuing a Section 10 request to fundamentally revise four crucial issues. This was done after the Appeals process, including report on submissions and oral hearing, had effectively been completed. It was a case of 'leaning-over-backwards' to be accommodating.

Section 10 Referral

This referral came in the immediate wake of Shell's takeover of Enterprise. Essentially it amounted to a fast-track option for the new owner to make a fresh application, and it reduced the criteria for a successful outcome to just 4 key issues. This was a most generous gesture but the response was blatantly arrogant. What emerged was an enormous volume of

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consultants' reports in which assumptions, assertions and assurances predominated, and little or nothing of substance was altered. This was put bluntly in the Executive Summary of the formal Response: "In the case of consideration of alternatives, visual impact and safety, the assessment is that there is no material change to what has already been stated in the Environmental Impact Statement…The main refinement relates to the need to use more stone within the drainage system."

Agreement

The enormity of this disregard by the Applicant for the role and status of ABP was breath-taking. Likewise, the responses and reactions of several ministers in the immediate aftermath of the ABP refusal suggest that the Applicant's confidence was well founded. Obviously nothing less than what was agreed in principle during initial negotiations was acceptable: the government wanted infra-structural development in Mayo and the developer wanted an on-shore gas refining facility. The fuller implications of this bargain were not teased out by the government, but the developer was clearly aware of the advantages of its end of the bargain and was unwilling to settle for less. This attitude permeates proceedings to date.

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Crucial Issues

Project Splitting

Our central objection is to the way in which clearcut critique of the Application has been frustrated by **'Project Splitting'**. This insidious practice has been pinpointed by a **'Reasoned Opinion'** (2001) from the EU Commission, which is a preliminary stage in bringing Ireland before the European Court of Justice. 'Project Splitting' is unacceptable because it is about leverage: that is, using permission granted for one part of a project to powerfully influence the granting of another less certain permission. When such insidious loopholes are given precedence over the clear intention of the law, the integrity of the system is undermined. Since the Applicant professes to uphold the 'Donovan Principles' (see: www.Shell.com) a reasonable test of their good faith would be for them to accept and permit overall project evaluation.

Gasfield Pressure

In this regard the safety issue arising from the on-shore section of the import pipeline is extremely pertinent. The enormity of a pipeline conveying gas at full gasfield pressure (150

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BAR/c. 1 ton per sq. in.) in close proximity to homes along a distance of 9 km, is one of the worst safety aspects of this project. It has been publicly acknowledged by an expert, Mr. Taylor, that world wide "***it is the only one of a kind that he is aware of***"(ABP Report p.76). Yet it comes under the scrutiny of no Competent Authority, neither Planning nor Health & Safety nor any other: in short, no responsibility is acknowledged by any government agency.

Landslides

This scandal is given dramatic significance by the fact that had the original intention of running the pipeline along the Pollatomish route been in place at the time of the recent landslides, it would in all probability have been ruptured with potentially catastrophic consequences. Its intended route was immediately above the graveyard which was severely breached and excavated by that section of the landslides. As the Det Norske Veritas report (p. 3.4) states: "the major causes of pipe rupture are external interference and ground movement." When major accidents happen, such as the recent gas explosions in China and Algeria, great concern is expressed. But too often, at the Planning stage major issues of safety, as instanced above, are not given specific consideration because of 'project-splitting'.

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Independent Evaluation

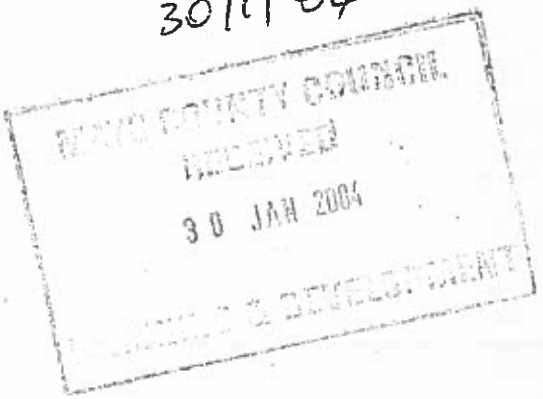
In view of all of the above obstacles to having vital aspects of the project as a whole brought under scrutiny, I requested assurances from the Planning Office that an independent, expert evaluation of the Application would be commissioned in respect to its diverse implications as reflected in the wide-ranging EIS. I made this request in the light of an official record of the Planning Section acknowledging in regard to a similar complex application that it did not have the necessary range of technical expertise within its own staff to evaluate such full implications. It nevertheless proceeded to adjudicate on the project and gave Planning Permission . This became a matter of serious concern when admitted publicly at an Oral Hearing. We appear to be heading down the same road again.

Edward & Imelda Moran
Chapel Street,
Belmullet.

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Rossport South
Ballina
Co. Mayo

6518
€20 cash
30/1/04



The Planning Section
Mayo County Council
Aras an Chondae
The Mall
Castlebar
Co. Mayo

29th January 2004

Re : Planning Application Ref No P03/3343 (as submitted by Shell E & P Ireland Ltd. on 17/12/03 and validated on 18/12/03) for the proposal to construct a natural gas terminal (refinery) at Ballinaboy, Bellagelly South, Co. Mayo. and to remove >450,000m3 liquid peat slurry to an area of cutaway peatland at Srahmore, near Bangor Erris, Co. Mayo, by Bord na Móna Energy Group Ltd. on behalf of Shell E&P Ltd.

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A Chara,

Please find attached our second submission dated 21/05/01 to application P01/900 as we feel, and in Shell's own words, the application has not changed substantially.

We take great issue with the fact that Shell E & P Ireland Ltd. did not see fit to advertise the planning application in any of our three local Mayo newspapers. This is the company that boast of consultation with local people. We feel that An Bord Pleanála turned down the second application for the gas refinery station on more issues than just peat. We recommend reading the inspectors' report with care. The proposed gas refinery station is contrary to proper planning and development of the area. Need we remind the planning authority that project splitting is totally wrong.

Enterprise Energy Ireland with all their expertise staff and now Shell E & P Ireland Ltd. with their expertise staff have tried to convince us that they had it all right. Since the start of this project, combined applications have been made to Mayo County Council under reference P00/2934 and P01/900 and now this current application P03/3343. Unfortunately we remain unconvinced. While making money is Shell E & P Ireland Ltd.'s priority our safety and health is ours.

Here we now have a proposal to remove thousands of tonnes of bog to

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Srahmore via a road that was unsuitable for heavy traffic when the last application for the gas refinery was submitted. We feel this proposal would have major negative implications. We cannot accept the destruction on local roads as a result of the proposed plan. The route proposed is out only form of access to Castlebar Accident and Emergency Hospital in an emergency situation.

Anyone can say we will be safe living here in Rossport while the event of Dooncarton landslide in September 19th 2003 is fresh in our minds we are very happy that this project was put on hold at the time. One doesn't want to think of the consequences of the vibrations on a newly constructed high-pressured gas pipeline (attachment re China case enclosed).

As we close our submission we urge the planning management and staff of Mayo County Council namely Mr Des Mahon, Mr John Condon and Mr Ian Douglas to look at this project very carefully and make the decision not to grant the application.

Yours sincerely

Mary Corduff

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Mary Corduff and family
Rossport South
Concerned residents

MAYO COUNTY COUNCIL
RECEIVED
30 JAN 2004
PLANNING & ENVIRONMENT

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Mayo County Council
Planning Office
Aras an Chontae
Castlebar
Co. Mayo

Submission / Objection to Enterprise Energy Ireland's Planning Application for a Gas Terminal in Bellanaboy, Ballina, Co. Mayo

21/05/2001

We are very concerned about the planned gas terminal in our locality, so much so that we went to the trouble to order a copy of the EIS from Enterprise Energy Ireland. With our 6 children we studied the EIS which we found very confusing and not consistent on figures and measurements given.

One of the main reasons why Enterprise Energy Ireland did a second EIS was because of polluting Carrowmore Lake. Now they will not only pollute the lake but Sruwaddacon Bay aswell.

Photomontage images were prepared, non were taken from Rossport, EIS page 1-12. Is Enterprise Energy trying to tell us we will not be able to see it?
The Biol. Lab Glenamoy is located right next to the planed terminal.
Each morning we can hear the dogs barking before being fed, we surely will hear the noise from the gas terminal too. The distance is approx. 2 km, and as pollution and noise travels by wind and air and not around the road it will reach us.

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The EIS is saying at one stage, buildings will be 12 m high to the eaves or only gives indoor measurements. And how high is the roof? And yet the highest building will be 13 m, surely a roof adds more than 1 m. Is that the way Mayo Co.Co. measures for planning of a house? Measuring some ones height is not stopping at their neck!!!

As landowners we were never told by Enterprise Energy Ireland of the difference in planning procedures for the gas terminal and the gas pipeline. They tried to hide it from us and confuse us.

We have been told odourisation will take place at the terminal, page 2-11, EIS 2.4.2. to enable detection of possible leaks in the gas distribution to provide improved safety for consumers, yet the pipeline (8,5 km) going through our villages will have no odourisation It could get damaged on route to the terminal. How can they safeguard our lives?

We will have a high-risk situation in the area and in Rossport on account of the gas pipeline passing through the village. There is only 1 doctor on call in Erris at weekends, and Mayo General approx. is 60 miles away.
We had a fire at the rubber factory in Belmullet not long ago, there was a potential risk of smoke and gas inhalation, and the rescue stretched the emergency to the full

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capacity. A fire at the gas terminal will have massive real risk; we don't have the required emergency capacity. There are only 2 fire engines in Belmullet.

The planed terminal is given 15 – 20 years livespan and on another page 30 years. Which one is true?

The same goes for measurements of peat, one page states 557.000 m3 of peat, and another says 600.000 m3, which is true?

Talking about how wrong it is to say a weaker blast will loosen rock sufficiently, is more or less admitting we will see massive blasting of rocks, not only at the terminal site, but in Rossport too for landing the pipeline in our village.

We have found out from the ombudsman, that no planning application is necessary for the pipeline, and Enterprise Energy can put it in wherever they like in our land. The pipeline would put a stop to any possible plans to build a house on our land. Development in our community would stop.

It is unacceptable that Carrowmore Lake will be polluted by drainage and the removal of such a vast amount of peat to such depths. Carrowmore Lake is Erris main source of drinking water. Even here in Rossport the group scheme cannot facilitate new houses. When our children build on or land we will have to rely on Carrowmore Lake.

It is obvious this company knows absolutely nothing about bog. They describe our bog as raised, even to call it so, is untrue.
Local people were told by DUCHAS not to cut turf anymore on account of damage being done to bogs, yet Enterprise Energy is planning to do a lot of damage. We know the bog where the pipeline and the terminal are planned is much deeper than what they are saying. When tree planting was done, we watched 3 big diggers and JCBs sinking in the bog. There could be plenty of oil being spilt and poisoning our Sruwaddacon Bay.

The whole site for the gas project will be fenced and the terminal will have a nearly 12 feet high electrified fence. What impression will tourist have driving along a high security fence for miles, and local communities having to live next to it?

It is a known fact that we pick the finest cockles and clams and mussels on our strands and shore as well as dulisk and carrageen. It is frightening to hear that mercury will be deposited out into our bay. We all know why sheep dip (Organo phosphate) is no longer used, because of the dip being cancerous. It's not a good combination, peat silt + mercury will kill salmon. We can fish for wild salmon in the Glenamoy River.

The list of heavy metals that will be discharged into Broadhaven Bay is frightening, especially because it will add to the raw sewage going into the Bay from Belmullet.

When the survey was done in our bay, we watched the staff trespassing fields, at a time when we were all on high alert on account of the Foot and Mouth scare.

We know how the flow in Broadhaven Bay goes in a circular movement, with stuff being swept in from outside. And actually the EIS is confirming it, by saying how the

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plankton is likely to be swept around and comes back to its original position, funnily enough the effluent from the pipes are supposedly being swept out. Enterprise can not have it both ways.

The pipeline on route to the terminal will pass through our village, according to Enterprise on our only green land. The future farming will be destroyed. All farmers will lose 40-m strip on route, therefore sod and stone fences will be traversed and destroyed.
As stated in the EIS drainage in future would be parallel to the pipeline, in Rossport that would be impossible.

As we submit this objection, it has officially been confirmed we have the Corncrake in our village. We have lots of wild birds, wild geese, ducks, and swans. I wonder what effect rock blasting will have on all this. The EIS states a weak blast will be not good, so we presume there will be massive explosions of rock, near to the nesting place of the corncrake.

Enterprise Energy says there is not much tourism in our area. This is not true. But after the terminal is build there will be none at all! Do we expect to draw anglers to fish for mercury filled fish?

In their EIS statement they say they have consult with a group in Rossport, The group mentioned doesn't exist. There are 2 place names mentioned, they are not known to local people.

If Enterprise Energy went back to correct their badly put together rubbish, maybe like a slow learner they need a remedial teacher.
We have to contend ourselves with what they will do, might do, and not studied because of Foot and Mouth.
But what we do know is pollution will most definitely follow from the terminal. In past years we have seen quite a few items coming down the Sruwaddacon Bay/ Glenamoy River from as far away as Glenamoy village. In heavy flood wire, stakes potatoes and even silage bales, peat silt are coming down the river.

EIS 5.2.2, page 5-1 promises a proposed pipeline between Galway and Limerick serving Erris and Shannon. Erris is nowhere near Limerick!
If Enterprise can't get this right, what else is wrong?

Mary Corduff
and Family
Rossport South
Ballina
Co. Mayo

Signed:

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Thousands flee gas leak in China

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AUDRA ANG
in CHONGQING

EMERGENCY teams capped a ruptured gas well with tonnes of sealant yesterday, cutting off toxic fumes that killed at least 198 people and forced 41,000 to flee a remote, mountainous area in southwest China.

The disaster was China's worst recent industrial accident, leaving a 10-square-mile "death zone" strewn with bodies of adults and children, some overcome as they tried to escape.

Yesterday, emergency crews began pouring hundreds of cubic feet of sealant down the well, which had spewed fumes for four days.

The government raised the official death toll by seven to 198, but didn't say when or how the additional deaths occurred.

The disaster began Tuesday night when a poisonous mix of natural gas and hydrogen sulfide erupted from the well, which reportedly was broken open by a drilling accident.

Some 9,185 people were treated for gas poisoning and other injuries, and 431 were still hospitalised — 17 in critical condition, the government said.

Newspaper photos showed children with red faces and their eyes swollen shut from chemical burns.

Officials said earlier the well would be plugged with cement.

There didn't appear to be any danger of a new blowout, experts said.

No details were released of how the sealing of the well was carried out. But earlier reports said technicians were using earth-moving vehicles and newspaper photos showed them wearing respirators and silvery, head-to-toe protective suits.

Light rain forecast over the next three days shou clear the air of toxir

However, there v mediate indicati evacuees living in s government buildi be allowed to go ho

China's cabinet appointed a team o tors to determine t the disaster and w sponsible.

Iran quake

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€20 cash
30/1/'04

Mayo Industries Group

CHAIRMAN:
MARTIN GILLEN
ALLERGAN

VICE CHAIR:
SEAN HANNICK
KILLALA PRECINCT

TREASURER:
PAUL MONROE
LIONBRIDGE TECHNOLOGIES

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Mayo Industries Group

Submission

to

Mayo County Council re

Corrib Gas Project

P03/3343

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MAYO COUNTY COUNCIL
RECEIVED
30 JAN 2004

January 2004

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Mayo Industries Group

CHAIRMAN
[redacted]

VICE CHAIR
[redacted]

MANAGING DIRECTOR
[redacted]

CONTACT
[redacted]

WESTPORT
CO MAYO

TEL
[redacted]

EMAIL
[redacted]

Introduction

Mayo Industries Group in this submission supports the granting of planning permission for the Corrib Gas project proposed for Bellanaboy Bridge, Co Mayo.

Background

The Mayo Industries Group is a group representing over 30 foreign direct investment and indigenous companies located in County Mayo.

The purpose of the group is to ensure that the infrastructural deficits in County Mayo are addressed as a matter of urgency to allow existing industry remain and become more competitive but also facilitate the expansion of existing projects.

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In association with the Chambers of Commerce in the BMW region, the Mayo Industries Group contributed to the United Chambers of Commerce report on the Critical Infrastructural Deficits in the BMW region *(see footnote 1)*.

It is widely recognised that quality infrastructure is essential to create favourable conditions for industrial competitiveness, employment creation, location decisions, inward investment and business expansion.

The Mayo Industries Group has highlighted the importance of improved access, telecommunications and energy infrastructure as a key driver of the economy in the county which would also have a positive impact on the West of Ireland.

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Mayo Industries Group

CHAIRMAN
MARTIN GILLEN
ALLERGAN

VICE CHAIR
SEAN HALPIN
KILLALA PRECISION

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We believe natural gas can provide an efficient and clean energy source and its importance as a potential driver for economic and social development in County Mayo cannot be underestimated.

Mayo has a significant number of high energy using industries. Key multi-nationals are located in the county including Allergan, Baxter, Hollister, Ballina Beverages (Coke) and APC, all who necessitate high quality and reliable energy infrastructure.

In this context, the availability of natural gas in this region will provide the energy infrastructure necessary to attract inward investment, facilitate expansions and also supply other non manufacturing businesses and domestic consumers.

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The Western Region until now has had no gas supply something other regions take for granted and we believe that the granting of permission for this project is in line with the Government stated objective of balanced regional development.

Other organisations promoting similar policies include

- **United Chambers of Commerce**[1] "the gas network to be extended to all major urban centres throughout the West and North West".

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Mayo Industries Group

CHAIRMAN
MARTIN GILLEN
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- **Council for the West**[2] the development of a gas pipeline network in all regions so that each region is attractive for inward industrial development.

- **Mayo County Council**[3] "fully supports the realisation of the Corrib Gas Field find" and it fully conforms to the new Mayo County Development Plan 2003 – 2009.

- **The Western Development Commission**[4] has argued that natural gas is an essential infrastructure and that it is necessary to expand the network in the region to enable it to compete with other parts of the country that already have access to natural gas.

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Conclusion

The Mayo Industries Group believe that the granting of permission for the Corrib Gas project will allow this region access to natural gas and the much needed opportunity to achieve its investment and development potential and compete with other regions that already have access to natural gas.

[1] The United Chambers of Commerce report the Critical Infrastructural Deficits in the BMW region 2002
[2] Regional Development – Policy Proposals – Council for the West – Jan '02
[3] Mayo County Development Plan 2003 - 2009
[4] WDC Jobs for towns – footnote 26 – December 2003

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IRISH PEATLAND CONSERVATION COUNCIL

COMHAIRLE CHAOMHNAITHE PHORTAIGH NA HÉIREANN

119 Capel Street, Dublin 1, Ireland

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Tel: +353-1-872 2384 Fax: +353-1-872 2397

Rno 6502
€20
30/1/04

Mayo County Council
Aras an Chontae
Castlebar
Co. Mayo

29th January 2004

RE: P03/3343 Shell E & P Ireland Ltd applying for Planning Permission at Bellagelly South, Srahmore and Attavally.

A chara,

The Irish Peatland Conservation Council would like to express their concerns over the above development.

1. We are concerned over the proposed transport route for the peat which passes in close proximity to Carrowmore Lake Complex. This is an internationally important site, which has been designated as a Special Area of Conservation (site code: 00476) under the E.U. Habitats Directive. This site has been designated because of the presence of an unpolluted oligotrophic/mesotrophic lake, surrounded by fairly intact blanket bog. The occurrence of a legally protected plant species, which is also listed in the EU Habitats Directive, is of particular interest. The site has noted ornithological importance, with breeding terns and gulls and wintering Greenland White-fronted Geese. The IPCC are concerned that this site may be damaged with the increase in traffic and road-widening that is proposed.

2. The main issues of concern regarding the Carrowmore Lake Complex are pollution and degradation of the lake or the relatively intact blanket bog that surrounds it. Active blanket bog is a priority habitat under the Habitats Directive and Ireland has a responsibility to ensure the protection of good examples of this habitat. There is also a fisheries and water supply issue and the IPCC are concerned that these may be affected.

3. The location of thousands of tonnes of peat on the area referred to as Area 6 is also a concern. Such a method of disposing of peat has never before been conducted on such a scale and the IPCC have reservations regarding binding of the new peat layer to the existing one.

4. The drains from Area 6 will eventually enter into the Owenmore River and the IPCC would like to see sufficient measures in place to prevent this river becoming polluted and also an adequate monitoring in place.

Please find the fee of €20 to cover the cost of this submission.

Yours sincerely,

Caroline Hurley

Caroline Hurley, MSc.
Conservation Officer, IPCC.

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10 pages including cover page.

Observations, comments and objections relating to the proposed Shell Gas Refinery at Ballinaboy, Co. Mayo.

Planning ref. PO 3/3343.

6533
€20 cash
30/1/94

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MAYO COUNTY COUNCIL
RECEIVED
30 JAN 1994
PLANNING & DEVELOPMENT

Submitted by -

Martin Harrington
Tallaghan,
Lyrsalla,
Ballina,
Co. Mayo.

Date - 30-1-94

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I

2.4.1 If the life of the Corrib Field is estimated at 15-20 years, why is the terminal given a design life of approximately 30 years and what is meant by: "Without modification it would not be possible to extend the plant to cater for reserves from other fields"?

2-21 "It is assumed that the peak rainwater and firewater flowrates are not co-incidental" – is this a safe assumption?

Table 2.3(e) What is meant by "extremely unlikely overpressure event"? Is this a friendly-sounding euphemism for a large explosion?

2-31 Why is "coincident operation of two detectors" necessary to "initiate executive actions"? What are "executive actions" and if only one gas detector operates will it be ignored?

2.3.6 Will workers be able to breathe if they are within the gas turbine enclosure when the extinguishing system activates?

3.3.1 Are there any safety ramifications involved in constructing the flare stack "in an area where the peat will remain in-situ"? (Stability, fire risk?)

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3.15 What happens if there is a fire on-site when the firewater ponds are being used as reservoirs during pressure testing - what are the safety implications? (See also 3.9)

4.2.2 "The relatively moderate size of the predicted Corrib reserves" - there was been no definitive answer given to the question of how much gas is actually there.

In regard to the rejection of fixed steel jacket or compliant tower - "the more benign environment of the Gulf of Mexico" is far more prone to hurricane weather conditions than the area of the Corrib field.

4.4.3 Regarding the rejection of Killala because this - "would require an umbilical which would be longer than current industrial experience" - this statement is false and misleading as Shell have constructed and are constructing subsea tiebacks which are considerably longer than the 65 KM run from Corrib to Ballinaboy.

4-12 "Environmental risks to watercourses caused by the disaggregated nature of pumped peat" - what condition will the peat be in after being excavated, dumped into a lorry and driven for 10 KM?

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III

5-12 How in it possible to equate - "The most popular reasons for visiting Wapo" with the construction of a gas refinery?

5.5.2 Misleading and irrelevant.

-22, 623 "Minimization of impact ... dependant on the successful implementation of pollution control measures / there is potential in the event of accident for impact to sections of the Castoramore Lake Complex / potential for such an incident will be minimised" etc, etc - minimised, not eliminated, the integrity of the lake cannot be guaranteed and there is no mention of the fact that Castoramore Lake is the source of drinking water for the people of Eris.

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-1 Figure 3.1 is a picture of an excavator and has no relevance to the topic under discussion - insufficient information given.

7.3.2 Once again, Figure 3.1 which is irrelevant.

8.3.3 "Faulting and cleavage are commonplace and provide the main planes of weakness (discontinuities) within the body of the rock" - this would not appear to be the basis for a suitable, safe foundation.

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8.4.7 How much phospate "can be carried into streams with soil in runoff"? - what levels are dangerous for flora / fauna / humans.

8.7 Mitigation measures - "expected to be / should be / minimised / may have" - etc, etc, - not very reassuring

10-9 In relation to radioactive materials: are "two available gas samples from the Cottle reservoir" sufficiently representative? In Table 10.9 what do the numbers in the "Proposed Design Criteria from expire" mean? What relationship does the Arcoona formation have to the Cottle formation and is it valid or relevant?

10.12 How is it possible for hourly average and daily average figures to be identical?

10.13 Why only year 2? Given there is the fact that the two largest contaminants in this table (boron and phosphorus) do not already exist in Broadhaven Bay (See Table 10.7) and why, throughout this section, has the existence and potential dangers of TENORM been conspicuous by its absence?

Kirk McLure Morton Dispersion Modelling Study - what are pages 8, 9, 11, 12 14, 15, 17, 19, 20, 21, supposed to tell a person?

Over 5 pl. 10

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11.13.1 "Other pollutants potentially emitted have not been modelled as they will not be emitted in (sic) significant quantities relative to air quality standards" – there is no guarantee of this. Also, is the dispersion model fundamentally flawed (and therefore irrelevant) as a result of not inputting all relevant data?

11.14 "Concentrations of carbon monoxide are clearly insignificant and are not discussed further" – other people may wish to discuss them.

12.2.3 Why exclude from baseline noise data conditions that are common in the area – "... traffic movements on wet roads after periods of rain"?

figure 12.5 Would these have been higher than usual traffic movement at this time as a result of clean-up work following the Doncaster landslide a few weeks previously? If this is the case, the noise levels would not represent the usual prevailing conditions.

12-8 "... any such blasting which may be required in certain areas." – previous mention that blasting could be unnecessary?

12-10 What is meant by "... the introduction of additional plant or variations to the proposed installation..."?

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13-4 "Figure 13.1 illustrates an aerial photograph ..., proposed terminal superimposed" – no, it is not.

13-16 "Both the day and night time photographs are taken from the same location" – this statement is false: there is a branch in close-up in the foreground of plate 13.2 which is not in plate 13.1, also the night time lights are in the top half of the picture whereas in the daytime picture everything is in the bottom half – why lie about this?

14.1.3 "Leaks are not considered to be significant in the context of site operations." – this is a very reckless attitude; what are the safety implications?

Also, there are no worst-case scenario figures given in relation to the effects of a major incident.

16.2.10 "If there is soil contamination all foundations will be removed and other non-soil type material to a depth of 1m below grade." – contaminated with what and removed to where?

Table 16.10 What measures are in place to ensure the safety of people in the event of a sulphuric or hydrochloric acid spill?

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VII

17-5 Is a waste management audit once a year sufficient?

18.6 "... further industrial development in North West Mayo cannot be precluded..." could this possibly be connected to 2.4.1 - "... extend the plant to cater for reserves from other fields"?

18.1 This proposed development is completely at odds with Sustainable Development Policy in Ireland. Irelands National Sustainable Development Strategy (1997) aims "to ensure that the economy and society can develop to their full potential within a well protected environment without compromising the quality of that environment and with responsibility towards present and future generations and the wider international community". Shell is a company whose disdain for the environment is well documented (Nigeria, Philippines et al) and there is no way whatsoever that the economy of Ireland can develop to its full potential if hundreds of millions (and potentially billions) of Euro are siphoned out of the country and into the Shell coffers through the exploitation of Corrib (and possibly other) gas fields as a result of the quite unbelievable concessions they have been granted.

19.3 Assumptions made for the scenarios - "... a similar checklist for gas infrastructure is unavailable" - how relevant is the checklist to the proposals?

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19-2 "The weightings have been developed for construction activities. As equivalent weightings have not been developed for gas terminal operations, these construction weightings have also been applied to the operational phase of the project". - differences have already been identified between construction and operational activities, so how can these weightings be applied?

19-3 Everything in Table 19.1 has either "lower performance against SD principle or priority" or "insufficient data to compare performance" - this is unacceptable.

19-5 Table 19.3, Scenario 1 - "If Bord Gais decides to supply ... this could result in a shift ..." - no guarantees that any of this will happen - is this more of the "carrot - for - the - donkey" technique?

19-6 Scenario 1 - "Use of gas close to its source rather than gas transported thousands of kilometres will be more energy efficient" - this statement is misleading as most of the gas will be pumped into the European Gas Network.

All of the points made in the table from the bottom of 19-6, through 19-7 to the end of 19-8 have "insufficient data to compare performance" - consequently the premises are fundamentally flawed and therefore meaningless.

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IX

Appendix A, Photomontage methodology.

1 Reference points - temporary masts to facilitate the preparation of accurate photomontages - if the tallest mast available was 11.20m lower than the top of the proposed flare stack then every photomontage is based on incorrect, misleading information and consequently everything perpetrated by Brady, Shipman Martin in this section is worthless.

Summary

Throughout this EIS there has been a constant stream of misinformation, disinformation unsafe assumptions and in some cases outright lies - this is synonymous with the arrogance for which Shell is well known. However, not only does this proposed gas refinery have the potential for major negative impact on the environment and people of Erris, it also has major negative economic impact for the country as a whole (refer to previous section 19-1) Therefore, until these issues can be satisfactorily resolved, I feel that planning permission for the proposed gas refinery at Ballinaboy cannot and should not be granted.

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SUBMISSION

IN RESPECT OF

PROPOSED BELLANABOY BRIDGE GAS TERMINAL, BELLAGELLY SOUTH, CO. MAYO & ASSOCIATED PEAT DEPOSITION SITE AT SRAHMORE AND ATTAVALLY, BANGOR, CO. MAYO.

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PLANNING REF. P03/3343

Submission - 8 pages
Appendices - 18 pages
€20.00 cash
5532
30/1/04

MAYO COUNTY COUNCIL
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Maura Harrington
30th Jan. 2004

MAURA HARRINGTON,
DOOHOMA,
BALLINA,
CO. MAYO.

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Verbal ,inhouse, unrecorded assessments.
B. Gannon ABP Ref. PL 16.126073

Mayo County Council announced grant of planning permission (with conditions!) for P01/900 at 4.55 p.m. on Friday, 3rd. August 2001 – the start of the Bank Holiday weekend and, traditionally, the time of year when most people go on holiday.

At the Oral Hearing granted by An Bord Pleanála subsequent to the appeal of this decision Ms. B. Gannon, then Senior Planner with MCC stated that permission for P01/900 was granted on the basis of 'verbal, inhouse, unrecorded assessments'. This permission was signed off on by the then, and now, Co. Manager, Mr. Mahon.

I wish to request that the current Senior Planner and *in situ* Co. Manager properly and verifiably assess P03/3343. That this proper assessment will, by necessity warrant intense investigation is, in the light of this Project's planning history (and in the continuing context of Flood/Mahon and Moriarty) a matter of national importance. Following the EU letter of October 2002 to the Irish Authorities a full and accessible verification of this planning process is also a matter of national importance. I am sure the omission of this component from Mr. Phillips' list of national imperatives was merely an oversight due to time constraints to meet deadlines.

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As an indigenous stakeholder in the Corrib Project I wish to advise the Planning Authority on my personal experience of how Shell's much vaunted CSR rhetoric is inversely proportional to Shell reality.

- **Shell is a sponsor of the Humbert School, inherited on Shell's acquisition of Enterprise Oil plc. On July 2nd 2003 the element of the school's programme designed to enhance Shell PR was held in an establishment which operates a selective admission policy towards myself – see appended copy of 'barring' letter and please be advised that the 'outrageous conduct and behaviour' referred to therein involved sitting on the hotel staircase until I established that the inaugural meeting of the EMG was by invitation only and was not open to indigenous stakeholders. On the evening of July 2nd I was refused entry to the Humbert School beano even though I was attending a course in the same place for all of that week, 1-5 July '03.**

- **This establishment was also the venue of choice by Shell for their 'public consultation' process in respect of P03/3343. I was again refused access and remained outside from 10.30a.m. to 6.30p.m. on Saturday 29th November 2003.**

- **On 19th November '03 I received an unsolicited telephone call to my home from Mr. Pyle – the tenor of the call, while polite, was nonetheless unsolicited.**

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- A public meeting was held in Belmullet in July 2003 – while ostensibly an outpouring of support for a failed concept it was, I believe, convened either at the behest of, or at the very least with the foreknowledge of Shell. In a carbon copy of the then Minister (DOMNR) Fahey's public meeting in Geesala, July 2001, the July '03 meeting was videotaped without seeking the permission of those present. I have been refused a copy of this video by the luminaries of the local Chamber of Commerce who commissioned it and I remain to be convinced that the same discourtesy has been shown to Shell. Mr. Fahey's DOMNR confirmed that the July '01 video was provided to the oil companies within days – it took 6 months to provide copies of the same video to local people. The refusal of Belmullet Chamber of Commerce to provide a copy of 'their' video continues to be a matter of personal concern with regard to both privacy and safety.

In the matter of the July '03 meeting referred to above I wish to advise the Planning Authority of the following. The meeting was attended by a Government Minister, Mr. Ó Cúiv and a Government Minister of State, Mr. Fahey; the two sitting government representatives for Mayo, Mr. Carty and Ms. Cooper-Flynn were not present. For the information of your good selves I wish to put on record that, in the context of considering the proper development of the Corrib Project Minister Ó Cúiv stated that other options were not viable, going on to say – and I quote that it had 'gone beyond the point of any other option'. One *has* to ask – 'gone beyond the point of any other option' for whom? Local communities? Broadhaven Bay, Sruth Fada Conn, Glengad, Rossport, Gortacreaghar, Ballinaboy, Carrowmore Lake and, now Muinhin, Owenmore and Tullaghan Bay? Was Mr. Ó Cúiv intimating that the Corrib Project had 'gone beyond the point of any other option' for MCC Planning Authority? for ABP? – or was he just thinking of Ray Burke, Frank Fahey and Bertie Ahern???

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I wish to put the following comments/questions/observations and ask that they be considered in your professional verifiable assessment of P03/3343. This is a representative sample only and is by no means exhaustive.

Volume 1

p.1 a critical analysis of the appended Brinded document should add to an informed consideration of the strategic importance of the Corrib reserves – from Shell's perspective.
p.3 'no technical difficulties or lack of know-how encountered' – other than the not inconsiderable difficulty of not understanding ones bog!
1.3 why are the non technical summaries available *only* from Shell's Dublin office?
1.4 Fahey signed the Foreshore Licence on his last day in office, 17:05:2002 thereby gifting to Shell the opportunity for despoliation of Glengad Beach and inner Broadhaven Bay before ABP had completed their consideration of Appeal PL 16.126073
2.1 'There are many areas designated as SAC's, SPA's and NHA's. None will be affected by the proposed development'.
This is a statement of incredible corporate arrogance coupled with breathtaking corporate stupidity.
2.3 'equipment layout has been designed such that prevailing winds will blow any escaping hydrocarbon gases away from safe areas of the facility'
WHITHER??? Are the indigenous villagers downwind of this obnoxion considered lesser beings within a cosy State/Corporate nexus?
2.3.1 'building finishes have been selected to merge with the landscape and refer to the traditional forms of agricultural and industrial vernacular buildings in the region' – STUPID, INSULTING AND INSUPPORTABLE
2.5.4 Mechanical Refrigeration System – quantify/verifiably assess dimensions/ visual impact
2.5.8 Additional Ion Exchange Unit – quantify/verifiably assess; ditto Additional Chemical Injection
2.6 'Emergency shutdown can also be initiated manually' Details and HSA implications
2.9 Will the video-conferencing to the Dublin ERC office be based on the 'put your head between your legs' philosophy?
2.2 (App. 2.1) UPS – verifiably assess history of such systems in comparable plants, if any such comparable plants can be sourced; if not, what 'authority' will take ultimate responsibility in the event of possible/probable future carnage?
3.2.5 When and by whom was the Glencullen Road designated a 'haul route? (Vol.2 16.4.8 – Were Tobin Engineering Ltd. and MCC commissioned by Shell to survey Glencullen Road? How many other roads in Erris have been surveyed by this team on behalf of the *people* of Erris?)
3.5.6 'A Bord na Móna representative will monitor loading operations to ensure the suitability of the peat leaving the site' – Just one? Using OM one presumes!
Fig. 3.7 Bog gone!!

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3.5.8 **What is a 'chemical crack inducer'? Nothing to do with quarrying on site?**

3.5.9 **If movement of peat is detected – what then???**

The presentation of what is supposed to pass as a consideration of 'Alternatives' is ludicrous.

5.3.4 **Per Mr. Phillips I learn that Barroosky has experienced a slight increase in the level of deprivation since 1991. Oh dear!**

6.3.4 **Survey Constraints – appears site would have to be first cleared in order to find anything; at which stage it would be entirely academic!**

6.7.2 **Protection of birds? – deter them from nesting; protection of frogs? – fill in their ponds!**

Aquatic Ecology section is quite useless since it makes no mention/admission of baseline cetacean study commissioned by Shell; received by them one year ago and still suppressed by them.

8.4.2 **'precautions will be incorporated into the construction procedures to mitigate the effect of man's intervention'.**

Post Dooncarton and Derrybrien I believe the foregoing is a hanging statement.

Section 9. The continued use of Belmullet Met. Station data is this EIS is reprehensible. Are the compilers of this section – for and on behalf of Shell – so obtuse and/or obdurate that they think they can persist in using inappropriate data for a vital component of this proposed project? Following the unanimous refusal of PL 16.126073 by ABP which specifically referred to 'the amount and pattern of rainfall in the area' and post September 19th 2003 such pussyfooting is no longer an option. Since all modelling based on inappropriate data is, by definition, useless I submit that on the basis of this major flaw planning permission should, and must, be refused.

Table 11.4 **TBC not listed in Glossary.**

12.9 **'No residual noise impact is predicted following decommissioning and reinstatement'. Quite!**

The less said the better about any Brady, Shipman, Martin contribution to Landscape and Visual Impact with regard to the Corrib Project.

14.5 **Verifiably assess the net 'potential benefit' for control of GHG's in Ireland per Corrib.**

18.9 **note ref. To Corrib as 'project'.**

Sections 19 and 20 are silly and wearisome.

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Volume 2

3.3 **What are HSA Guidelines for prevention of Repetitive Strain Injury in flagmen?**

3.4 **Where on site will excavated peat from peat reception area be stored?**

4.3.3 **Treatment of peat '…have yet to be proven for foundation purposes, for buildings and equipment' – admission of untried nature of lunacy proposed for Ballinaboy/Srahmore?**

Note to *4.3.10 – 4.3.13*

Some time ago (date recorded), I attended a Council For The West Energy Committee meeting chaired by Ms. Marian Harkin. You might find the following account of its deliberations re the proposed Corrib Project somewhat instructive. The Chair asked the committee's resident 'oil and gas expert' , one Mr. Bill Jones for his report on the CFTW-organised meeting in Glenamoy, May 2001. Mr. Jones reported, and I quote 'They were very stupid people at the meeting in Glenamoy; I had to explain things to them.' (end quote). Mr. Jones went on to opine that it would be hard to find a more unsuitable site than that at Ballinaboy adding that it was obviously chosen from a helicopter. Mr. Jones' solution to the 'peat problem' was to liquefy it and dump it in Broadhaven Bay!

4.5.3 **This nonsense should carry a Health Warning – seriously damages rationality.**

5.2 **'Qualitative research was informed through discussions with local representatives from Bord na Móna'. Quite.**

5.3.8 **Mr. Phillips becomes further embogged with the following gem:**

> **'There is a general shortage of accommodation in Mayo, which is partly due to the suitability of the land for building as it is mountainous, boggy, sandy or liable to flood.'**

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I note that while Arhom and Vowth have been deleted, Glencad and Inbher (*sic*) are misspelt.

6.4.4.1 **Where is Fig. 6.1?**

6.6.1 **Is a long term temporary impact an oxymoron?**

6.10 **How in the name of God would dozing/excavating operations keep moving peat in place?**

6.11.2 **'There are no negative residual impacts foreseen at this stage' - might this horribly offensive sentence have been copied and pasted from the Derrybrien Wind Farm EIS?**

7.2.1.2 **Why no sampling of Muinhin in October 2003?**

7.5.2.1 **'should be' – not acceptable**

7.5.2.2 **'should', 'could' – not acceptable**

7.5.2.3 **Where has it been demonstrated that 450,000 cubic metres of dumped peat on cutaway bog has revegetated within 5 years?**

8.3.7 **'Carrowmore Lake is a major public drinking water supply' – disingenuous – Carrowmore Lake (spring fed) is the source of the Regional Water Supply for Erris and, as such, is much more than a back-up firepond for a gas refinery.**

Table 9.3 **Belmullet Met. Station data *again*.**

11.5.1 **Air sampling data at Ballinaboy since 2001 – why no comparable site rainfall data?**

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12.5.1 **How can local residents be given at least one week's advance notice of all-night haulage due to fine weather if it's raining cats and dogs at the time?**

13.5 **last para. – Marian Shrine is recently built <u>not</u> recently renovated.**

13.8 **'very limited sources of light, primarily from the scattered residential properties' – THAT IS A BLATANT LIE. The primary source of offensive light pollution in this area is <u>not</u> from what Brady, Shipman, Martin would disdain as 'one-off housing' but comes from the legally questionable GLANCRÉ TEO. plant at Muingmore.**

14.3 **third bullet – incorporation of peat etc. etc. Why not leave it where it is in Ballinaboy?**

14.4 **Why can't the effect of these releases be specifically quantified?**

16.2.6 **'It should be noted, however, that if the development did not proceed there would still be the issue of disposal of 450,000m3 of peat from the Bellanaboy Bridge Gas Terminal foot print.'**

In a litany of lunacies that is one of my favourites! However, putting mirth aside, one must ask – is the omission of the word 'proposed' from the above based on the Ó Cúiv premise of 'gone beyond any other option'?

17.2.5 **How will peat slurry create a carbon sink?**

18.2 **I believe this could best be described as an Unholy Alliance!**

18.3 **If <u>both</u> interconnector supplies from the UK should be interrupted then endemic (*sic*) gas would probably be academic!**

(Chambers - endemic adj. prevalent or regularly found in a people or a district:confined to a particular area (biol).)

19.2 **What is the point of a pro-forma draft EMS?**

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Within the entire EIS, a demented concept masked in geotechnical arrogance, there is <u>one</u> coherent sub para (copied and pasted) - in Vol. 1 at *4.5.7* and in Vol. 2 at *4.3.7* which reads;

> **'The excavated peat would not be suitable as an engineering fill material. It cannot be laid down and compacted to meet engineering criteria. The characteristics of the mineral soils are quite variable.'**

Compare and contrast the following statements from Mr. Phillips, Town Planning Consultant, on behalf of the applicant (my italics in both).

'The proposed construction methodology, sequencing and programme (including an examination of traffic generation) were subjected to detailed scrutiny at the Hearing (to a degree not previously experienced by the Project Team members who have contributed to such Hearings). *Notwithstanding this, the Project Team, comprising individual experts and firms of international experience in dealing with peat wish to reconfirm their collective endorsement of the proposed methodology for the extraction and placement of peat.'*

Review of issues arising at the reconvened Oral Hearing and concluding comments. Phillips. 10 December 2002

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'.....the proposed development, an on-shore Terminal, represents the best option for the processing of natural gas and the site at Bellanaboy *in association with the Srahmore peat deposition site represents the best technical solution and location for such a development.'*

Planning Report. Phillips. December 2003

Consider the following 10 DAY timetable for reducing a noble, long-lived entity with its inherent integrity to a state of disaggregated muck:

> **(i)excavate *in situ* peat in Ballinaboy; (ii) place – oh so gently - into dumper truck; (iii) trundle to windrow site; (iv) dump at windrow site; (v) stew for 8 days; (vi) get observation methoded by Bord na Móna representative; (vii) dump 11 tonnes onto 4axle lorry; (viii) drive – oh so carefully – for 10 miles along Glencullen Road; (ix) dump onto concrete at Area 5; (x) load onto Haku system trailer; (xi) trundle to high field; (xii) dump on high field; (xiii) bulldoze onto low field; (xiv) camber gently to create (inappropriate data) rainfall runoff.**

I challenge anybody with any modicum of rationality to call the above anything other than demented.

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The refusal by the applicant - assisted, if not very ably, by incompetent acolytes – to accept the reasoned, unanimous judgement of An Bord Pleanála in PL 16.126073 and the continued unhealthy attachment to Ballinaboy means, I believe, that the Corrib Gas Project has moved beyond being 'just' a planning issue to having long-term implications for judging the current status of the democratic health of this State.

There are many, many citizens – of all ages – whose attention spans haven't been eroded by rampant consumerism and whose integrity isn't pegged to the dollar or the euro to ensure that the machinations surrounding this project (all of them well documented) will, in time, be aired in appropriate fora.

P00/2934 is defunct

P01/900 was deficient

P03/3343 is demented

To date, neither political patronage nor planning pusillanimity has 'built a gas terminal in a bog'. Nor will they, *Deo favente*.

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APPENDICES

EU Letter, 01:10:2002

Guardian Article, Jan. 21, 2004, Christian Aid CSR Report

Humbert School Programme, Jul. 02, 2003

Solicitor Letter, Jul. 09, 2002

The Changing Global gas Market, Brinded

***Aides Memoires*, P01/900**

Western People Article, Jan. 28, 2004

Ken Saro-Wiwa, R.I.P.

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EUROPEAN COMMISSION
DIRECTORATE-GENERAL
ENVIRONMENT
Directorate D - Implementation and enforcement
ENV.D2 - Legal implementation and enforcement

Brussels, 01. 10. 2002
D(2002) E . V.D2/JL/slv/525098

PRIORITY
AERPHOST

Ballina,
County M yo,
IRELAND

PRIORITY
AERPHOST

I refer to your complaint P2001/4619, concerning development c the Corrib gas field off the Mayo Coast.

Firstly, I wish to apologise for the delay in investigating the issues aised in this complaint. This is due to the volume of complaints received by the Commission ov the past twelve months.

The Commission has recently written to the Irish authorities seek g the following information, in order to investigate the issues raised in your complaint:

1. any general comments they consider appropriate on the claim made ;

2. comments on the report presented by An Taisce to the Depart nt of the Marine and Natural Resources in March 2000 concerning claims of deficien ies in the Irish regulatory framework for offshore oil and gas exploration;

3. details of how wastes generated from offshore oil and gas exploration are regulated by Ireland in accordance with Directive 75/442/EEC on waste, to ther with details of how they were regulated for the Corrib development;

4. comments on claims that seismic surveys and exploratory appraisal well drilling were conducted by Enterprise Energy Ireland Limited since 1996 w hout environmental survey or regulation;

5. comments on the steps taken or to be taken to ensur respect for Article 12 of Directive 92/43/EC on the conservation of natural habitats an of wild flora and fauna with specific reference to the disturbance of cetaceans and effect on their breeding and resting areas as a result of this proposed development, including e exploratory work (seismic surveys and exploratory drilling) already undertaken in B adhaven Bay and also the proposed Summer 2002 commencement of blasting works in p paration for pipe-laying;

6. details of any derogations granted pursuant to Article 16 of D ctive 92/43/EC;

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7. in the light of the requirements of Article 6(3) of Directive 92/43/EEC as well as Directive 85/337/EEC on the assessment of the effects of certain public and private projects on the environment, comments on the claims that the information provided by the developer by way of EIS was deficient with regard to interests protected under Directives 79/409/EEC[1] on the conservation of wild birds and 92/43/EEC, that there has been a lack of base-line survey work and other adequate prior investigations (e.g. 1 day tidal and 1 day bird study), and that further investigations have been inappropriately deferred to the post-approval stage;

8. having regard to the links between the different project components making up the Corrib development, comments on how "in combination" effects have been addressed by the different decision-making authorities, together with comments on the fact that the Environmental Protection Agency Act 1992 appears to inappropriately constrain the role of planning authorities with regard to decision-making on impacts affecting Natura 2000 sites;

9. clarification on the decision-making authorities with responsibilities for ensuring respect for Articles 6(3) and (4) of Directive 92/43/EEC with regard to each project making up the Corrib development;

10. details of the ascertainments, including the bases for same, of decision-making bodies that the Corrib development would not affect the integrity of Special Protection Areas (SPAs) and proposed Special Areas of Conservation (SACs) with regard to the following: pipe-line construction, with particular reference to conditions for Harbour Porpoise and Bottlenose Dolphin and wild birds hosted by SPAs; approved discharge location and future pipe-line discharges from the proposed terminal; treatment and discharges of waste-water arising during the construction phase of the proposed terminal; the risk of groundwater and other water pollution arising from the terminal;

11. having regard to evidence of significant risks to Natura 2000 sites arising from the choice of terminal location, details of the consideration given by decision-making authorities to alternative terminal sites.

The response of the Irish authorities is currently awaited and I will keep you informed of developments.

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Yours sincerely,

L. Cashman
Principal Administrator

[1] Including Sand Martins

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Social responsibility is just a PR tool for businesses, says report

Terry Macalister
Wednesday January 21, 2004
The Guardian

Businesses are using corporate social responsibility as a shield behind which to campaign against environmental and human rights regulations, warns a report published today.

Christian Aid claims CSR is in some cases counter-productive, worsening relations between business and local communities.

Shell's chairman, Sir Philip Watts, is one of the executives attacked for playing a leading role in CSR while lobbying against tougher international laws. His company is held up as an example of a group that is implementing CSR initiatives in Nigeria, some of which are backfiring.

Christian Aid's report, Behind The Mask: The Real Face Of Corporate Social Responsibility, calls for new international guidelines to govern company behaviour.

It wants UK legislation to:

· Make corporate social and environmental reporting and disclosure mandatory;

· Give directors a duty of care for communities and the environment, making them legally responsible for the actions of their companies overseas;

· Enable people harmed by UK companies' operations overseas to seek redress in British courts and provide resources to allow them to do so.

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Christian Aid also argues the OECD should adopt a convention on the same issues similar to the one that covers bribery.

It says CSR is being used as a public relations tool and believes it is no coincidence that companies in areas such as oil, mining and tobacco are its biggest public champions.

The charity highlights attempts by the United Nations to introduce a set of principles governing corporate responsibilities on human rights that were opposed by business groups, on the grounds they were already dealing with such issues with their own voluntary CSR initiatives.

It also notes that attempts to use the US Alien Tort Claims Act by those claiming to be victims of corporate human rights and environmental abuses overseas have been resisted by companies.

The UK branch of the International Chamber of Commerce - chaired by Sir Philip - has been lobbying against ATCA, but a Shell spokesman last night insisted the oil company recognised the right of governments to introduce mandatory codes. "Our point is that such measures must be clear, well formulated and produce a level playing field for everyone across all jurisdictions," he explained.

Shell is in the firing line over its activities in the Niger delta, where relations with the community have been tense since the deaths of poet activist Ken Saro-Wiwa and eight others who protested about oil activities in the region.

The executions - and the ensuing world outcry - led to the Anglo-Dutch group adopting a CSR policy.

Christian Aid says that despite Shell's claims about "honesty, integrity and respect for people", the oil company has failed to bring about change in the delta.

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"Christian Aid has found evidence that Shell's clean-up of oil spills and repair of pipelines in Nigeria is scandalously inadequate and would never be tolerated in Europe and North America."

The failure of CSR schemes has only added to the bad feeling between the local community and Shell, argues Andrew Pendleton, author of the report.

But the oil company argued that outside auditors had assessed its programmes in Nigeria and concluded that 93% were functional and 75% successful. Shell was working hard to improve the 25% that were not as good as they could be, a company spokesman said.

Christian Aid also highlights British American Tobacco and Coca-Cola as firms that - it alleges - preach CSR but fail to deliver on the ground.

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Coach leaves Ballina 6.30pm

SESSION FOUR

8:00p.m.	Teach Iorrais Hotel, Geesala
Welcome	*Frank Chambers,* Cathaoirleach, Mayo County.
John Healy Address:	*Martin Cullen,* Minister for the Environment and Local Government.
Response:	*Andy Pyle,* Managing Director, Enterprise Energy Ireland.
Chair:	*Tony McGarry* Chairman IHS

Coach returns to Ballina
approx 11pm

Thursday, July 3rd:

SESSION FIVE:

11a.m.	Moyne College, Bu[illegible]m. *Sean Boyne,* **Political Editor, Sunday World.** *Sean O'Rourke,* **RTE Reporter**
Response:	*John Dowling,* **Political Editor,** *The Star.*
Chair:	*Linda Gasparello,* **King Communications Group, Washington DC.**

SESSION SIX:

1:30p.m. 'God Save America'	Bartra House Hotel *Conor Brady,* Former Editor, *The Irish Times.*
	Llewellyn King, Publisher, *White House Weekly*, Washington D.C.
Chair	*Matt Farrell,* Vice President, Ballina Chamber Commerce.

SESSION SEVEN:

8 p.m.	Humbert Dinner, Downhill Hotel , Ballina.
Guest Speaker:	*Michael Martin,* Minister for Health and Children.
Chair:	*John Cooney* Director, International Humbert School
Response:	*Martin O'Rourke* Managing Director, EPA Ireland

http://www.humbertschool.com/program.html

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DENIS M. MOLLOY B.C.L., Dip.Eur.Law.
- Solicitors -
Bridge Street, Ballina, Co. Mayo.

Telephone (096) 21061,
70660,
21304.
Fax No. (096) 70636.
DX 14002

Our Ref: DMM/JR
Your Ref:
Date: 9th July 2002

Maura Harrington
Tullaghan Baun
Geesala
BALLINA

Our Client: Teach Iorrais, Geesala, Ballina.

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Dear Madam,

We are instructed by our above named client to advise you that due to your outrageous conduct and behaviour on our clients premises, you are HEREBY BARRED from our clients premises and for the avoidance of doubt this also means that you are barred from entering onto any part of the curtilage of the premises including the car park.

This barring notice takes effect immediately on receipt by you of this letter and accordingly should you attempt to set foot again on any part of our clients premises, you will be committing an offence and dealt with accordingly.

Yours faithfully,

DENIS M. MOLLOY, SOLICITORS

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The changing global gas market

Malcolm Brinded

Group Managing Director, Royal Dutch/Shell Group

CEO, Shell Gas and Power

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Oil and Money Conference, London,

5 November, 2003

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As global demand for energy increases, gas is increasingly playing a more significant and strategic role in meeting that demand. The gas sector is poised for tremendous growth over the next two decades - and between 2020 and 2030 it is set to overtake oil as the world's preferred fuel. Regional markets such as – North America, Europe, and Asia Pacific – are becoming increasingly interconnected leading to a global market. A critical factor in shaping this new global market will be the continued rapid growth of Liquefied Natural Gas (LNG). However, the structure of the LNG market will be different to that of oil because of high development, storage and transportation costs. Long-term contracts will tend to prevail as customers require security of supply, and investors need confidence in markets before taking investment decisions. Other key factors will be political and technological. The desire of governments to find secure and diverse energy supplies will be crucial, as will environmental considerations. Technological advances will be vital, allowing the industry to tackle large-scale projects and extend the lives of existing facilities. Resource holders with large remote gas reserves also have a major new option to monetise their gas – Gas-to-Liquids.

Good morning, ladies and gentlemen. As my title states, gas markets are indeed changing – and more changes are ahead, but maybe not the changes that some here expect.

I want to sketch what we can expect, why it's happening, and the crucial role of LNG in all of this. As my fellow speakers this morning are concentrating on the North America gas market, I feel it's useful to establish the global context in which the major developments in North American gas are playing out.

There are four things that I want to stress. First, gas markets which have traditionally been almost entirely regional – North America, Europe, Asia Pacific – are becoming increasingly interconnected and so to some extent global. Second, LNG will play the critical role in determining the nature and structure of those global markets. Third, gas markets will not develop in the same way as the oil markers with which we are all so familiar. Finally, we need to recognise that government priorities and technology are two key factors shaping developments to come. *(Figure 1)*

Gas markets are becoming global

Why are gas markets slowly globalising? Let's remind ourselves of the changing shape of the energy basket. Shell energy scenarios indicate that oil and gas will remain dominant, but decreasingly so, to the middle of the century. *(Figure 2)*

But the relative split between oil and gas is changing, as you can see here on the right. It's possible that gas will overtake oil as the fuel of choice between 2020 and 2030, driven by economics, environmental factors and consumer choice.

So gas will be in greater demand – how will that demand be met?

This is where we start to see clearly why gas is becoming more global. Falling indigenous supply from maturing fields in the US and the EU will not be enough to meet steadily rising demand. The US won't be able to rely ***only*** on Canada, nor Europe ***only*** on Russia, to meet the shortfall. More imports will be needed – and LNG will have some 15 to 20% of those markets by 2020 or so. *(Figure 3)*

The issues are different in China and India, where very rapid economic development requires significant gas-fired power generation and industry, and indigenous reserves are, in comparison, quite limited. Hence gas demand growth will need to be supported by imports to keep up the pace. Here as well, LNG will play a key role.

So for many reasons, global gas growth between now and 2030 will be substantial. And we can see LNG growing especially fast – by a factor of 5 by 2030. *(Figure 4)*

We also know that LNG will be

"It's possible that gas will overtake oil as the fuel of choice between 2020 and 2030."

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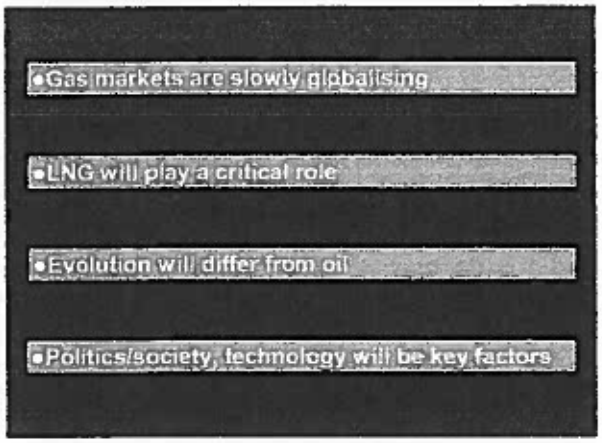


Figure 1: Changing Gas Markets

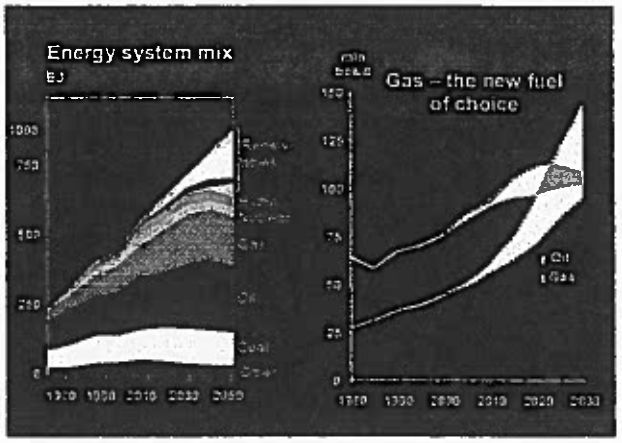


Figure 2: Changes in Energy Usage

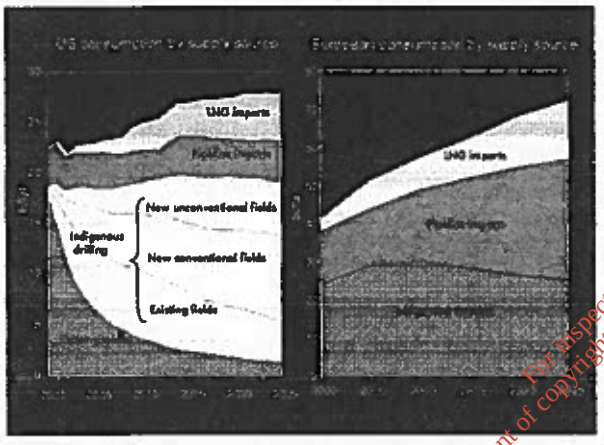


Figure 3: Indigenous supply vs demand—US, Europe

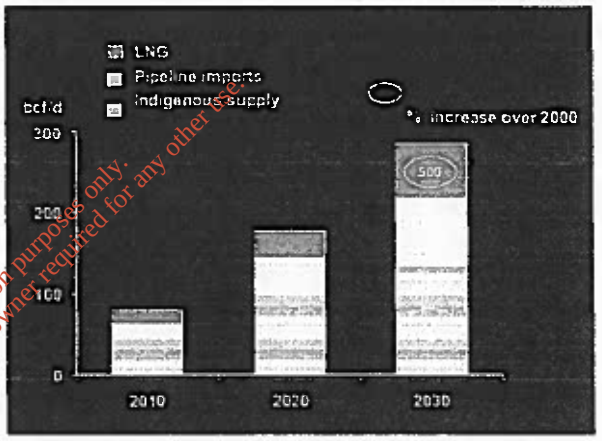


Figure 4: Global gas growth to 2030

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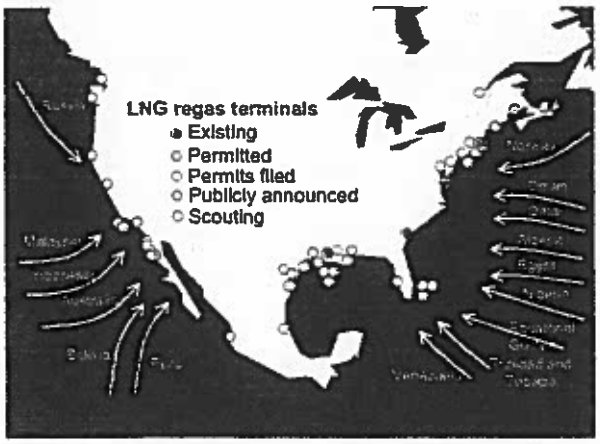


Figure 5: Growth in North American LNG regas projects

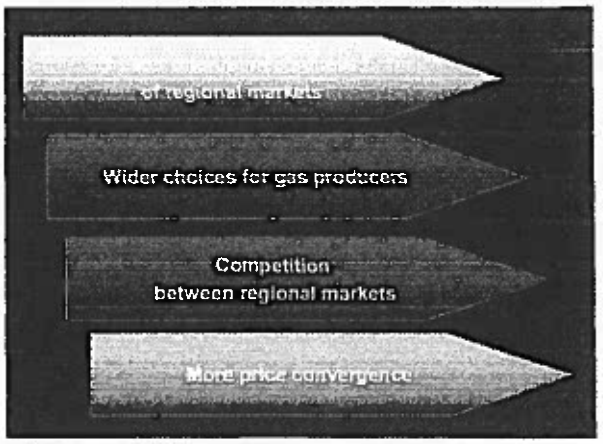


Figure 6: LNG impact on gas markets

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travelling over greater distances. The major gas reserves are far from the major markets. So LNG trade will connect gas markets that were previously regional 'islands'.

By 2010 we can expect much more trade and much more diversity – with respect to who's taking imports, and where those imports are coming from.

Furthermore, US markets will exert a major pull in the LNG market. Not all the potential regasification projects in North America will come to fruition, of course. But market analysis suggests 40 to 80 mtpa of open demand in the next 10 years. This is a race, which the front-runners will win – and I believe Shell is well positioned. *(Figure 5)*

Development on this scale will take massive investment. Perhaps up to $80 billion dollars over the next 10 years alone to support LNG growth in just the Atlantic Basin; and about two thirds of that is likely to relate to North America.

LNG will determine market structure

Overall, LNG will be one key determinant in the changing structure of global gas markets.

First, through the growing market interconnectedness that we've just seen.

Secondly, because it expands the choices open to gas producers, regarding where and to whom they sell their product.

Third, the potential speed and scale of growth of US LNG demand, accompanied by firm demand in North East Asia and Europe, will also lead to competition between markets to secure supply.

Regional price differences will still predominantly reflect the fundamental supply and demand balance and number of customers in each region, as well as LNG shipping and storage costs and rigidities. However, those differences cannot get too large. Indeed, regional prices *will* become somewhat connected, but with mushy and delayed action transmission, quite different from the direct drive of the oil market. *(Figure 6)*

Gas markets are different

Why this difference from oil?

For one thing, the ***cost structures*** in oil and gas are quite different. The industries are at different stages of maturity; in gas, there are fewer assets and much is being built, using very large amounts of capital, particularly in LNG.

Moreover, the basic costs of liquefying, transporting and regasifying LNG are much higher than the equivalent oil chain. Transportation and distribution is a far higher proportion of the delivered cost of gas: a typical LNG tanker is about four times the cost of a crude carrier of the same capacity.

Also, during transport and storage LNG cannot be perfectly insulated and some 0.15% per day is typically lost through boil off – unlike crude oil, the product deteriorates with time. Equally, gas is much more expensive to store than oil.

International gas contracts tend to be long term, rather than short term. Suppliers need them before they will feel confident enough of their future income streams, as well as arrange the necessary finance associated with their long-term investment decisions. Customers also like long-term contracts, because they will have invested heavily in the power stations or industries that use the gas, and often value greatly having price steadiness and predictability, as well as security of supply. These factors are not going away, which is why long-term contracts will prevail across much of the industry.

The value chains in oil and gas are different. For example, the LNG industry today operates almost entirely with producers contracting directly with gas utilities as buyers, on either an FOB or ex-ship basis. It's very doubtful that we will see large scale trading of LNG – *à la* crude oil, with an extensive paper as well as physical market – even in the medium-term future. However, companies with a global LNG portfolio, and a long history of trading in oil markets, will have an advantage, whatever the pace and nature of the changes to come.

New players are coming in to link and strengthen the gas value chain. We can see a trend: with downstream companies moving upstream – for instance Sempra, GDF, Union Fenosa; and customers getting into supply projects to safeguard the security of their

"LNG will be a key determinant in the changing structure of global gas markets."

"Long-term contracts will prevail across much of the industry."

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supply – for example, CNOOC, Kogas, and some Japanese customers. But the number of players in the LNG business will remain significantly smaller than the range of oil players. And many of these new arrangements actually reinforce long-term supply deals. So this is not a major driver of market structure change.

Indeed, LNG will continue to be a unique market, but we nonetheless are seeing some gradual shifts in this market. *(Figure 7)*

A greater mix of contract types, for one thing. Investors may not be happy to see less long-term commitment before they approve funding for projects; but customer needs must be served.

However, a significant volume of base load on long-term contracts is, and will still be, required because of the amount of money invested in LNG projects. Also, increased focus on security of supply plus potential shortfalls in the context of the USA market pull are also again driving customers to look for long-term deals.

Where in the past there was virtually no spot market in LNG, greater liquidity due to a greater number of projects and destinations will help to foster the emergence of such a market – but on a limited scale, mainly based around the small amount of uncontracted cargoes in an LNG project build-phase, or that arise due to capacity debottlenecking.

However, we won't see the oil spot market being recreated: for reasons of transportation costs, quality restrictions, receiving terminal constraints, shipping availability, and – most importantly – the huge amount of investment at both ends of the chain.

Project approval requirements are changing as demand for gas grows rapidly, as new countries enter the game, and as players gain experience and understanding of the markets. All these factors increase confidence to accelerate project go-ahead. So we see some projects accepting a gap of uncontracted supplies at FID. However, there is still a strong push for a significant base load of "take or pay" contracts from equity sponsors and – where applicable – financial institutions as a condition for project finance.

I've already mentioned a reduction in global price differences in LNG. High LNG demand and prices from the US will surely have an impact on price in Europe and on contract renegotiations in Asia Pacific as well. Don't expect to see a global price for LNG, but different regions will impact each other's prices.

Finally, market signals show that customers are willing to experiment with pricing mechanisms. It's not certain where this might lead, but we will see more variety – for example, with the US price linked to Henry Hub; the EU price linked to pipeline gas that is linked to oil, spot gas price and sometimes electricity and coal; and Far East prices linked to oil.

In all of this the direction is apparent, but the pace, and the end point, are uncertain.

"Don't expect to see a global price for LNG, but different regions will impact each other's prices."

Key shaping factors

What will determine how quickly, and effectively, change takes place in global gas markets? I believe two key shaping factors are political and societal considerations and technology.

One of the key concerns of governments, and the consumers and businesses they govern, is security of energy supply. And security of supply depends largely on diversity of supply. Let's not forget gas demand in Japan and Korea was originally driven by security of supply, after the oil shocks of the 1970s.

Closely linked to security of supply are concerns about import dependence. As the European Commission pointed out in its green paper last year, diversification is the key response to growing import dependence – diversification of energy sources, supply countries and supply routes.

In terms of LNG, diversity is clearly on an upswing. Today we have 12 countries with 14 plants and 110 mtpa annual sales.

In 10 years' time there will be more than twice as many plants in twice as many countries, supplying twice as much LNG to a larger base of customers – which will be good for everyone. *(Figure 8)*

For this supply diversity to really deliver security, the infrastructure needs to be in place – interconnected pipelines

"...two key shaping factors are political and societal considerations, and technology"

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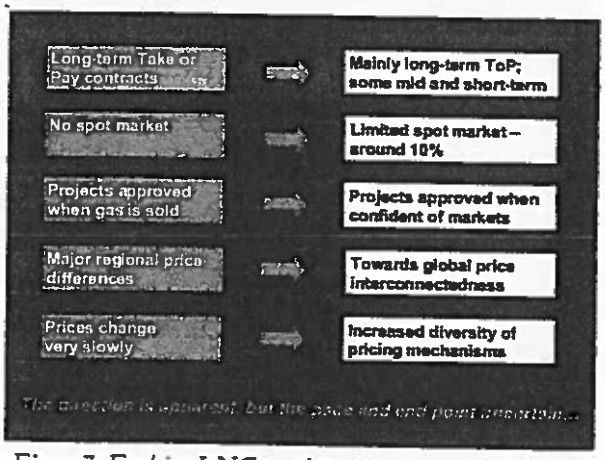


Figure 7: Evolving LNG markets

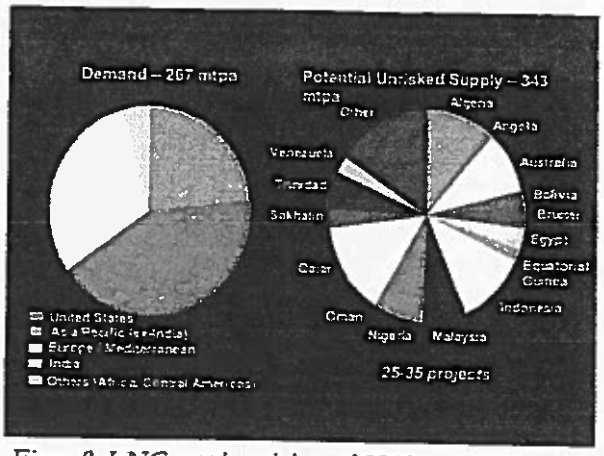


Figure 8: LNG supply and demand 2012

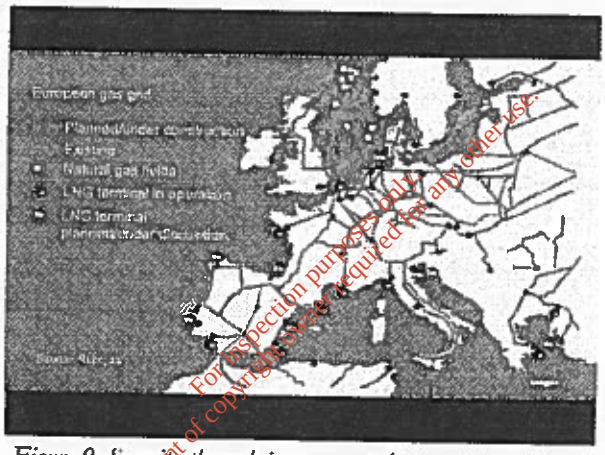


Figure 9: Security through interconnectedness

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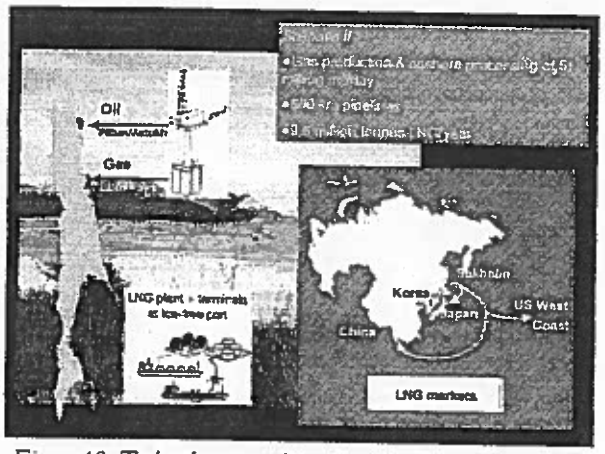


Figure 10: Technology—making the most of reserves

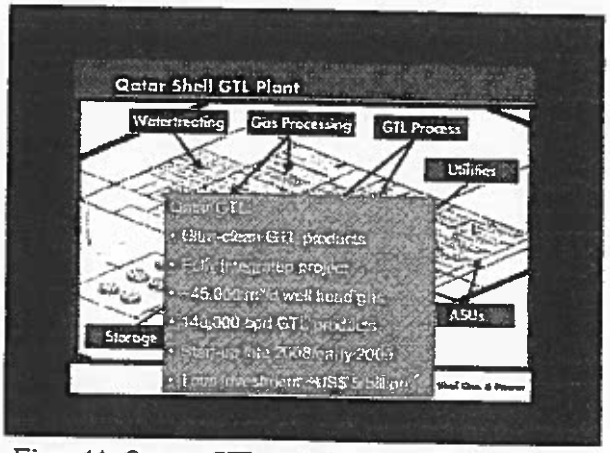


Figure 11: Qatar: - GTL capital of the world

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and sufficient LNG regas terminals.

Major infrastructure developments are under way or proposed in Europe. Similar developments are taking place in North America and Asia Pacific, as you know. *(Figure 9)*

These developments mean no region will be beholden to any one supplier for pipeline gas or LNG, which will help to reduce security of supply risks in an energy-hungry future. This is a key message to get across to decision makers in government, who worry about becoming dependent on imported gas.

A second consideration for governments is the environment. Different countries are dealing with it in different ways – but most are moving, at a greater or lesser pace, towards reduced energy intensity and pollution which encourages the growth of gas.

In Europe, adherence to Kyoto will increase gas demand appreciably by 2012. On the other side of the world, China has introduced new penalties on SOx and NOx emissions which will improve the competitive position of combined cycle gas turbine plants.

Finally, I would like to mention the drive to establish bilateral gas trade agreements between countries looking to forge closer overall partnerships – for example, China and Australia have one $18 billion deal in the bag from North West Shelf and last week announced another potential multibillion deal – from the Gorgon field – with both Heads of State watching gladly from the wings.

Now, if these are the political considerations shaping the market changes that will take place ahead, what are the key technology factors I referred to?

First – leveraging scale and overcoming a hostile environment. The projects that the gas industry can now undertake are virtually unbounded. A good example is Shell's $10 billion Sakhalin II project, with its ice-bound offshore platforms, and 600 km pipelines to the ice-free LNG plant, which will process 9.6 million tonnes per year for nearby markets. *(Figure 10)*

Technology is enabling us not only to do bigger new projects, but also to make the most of what we have. In Brunei, technology improvements have doubled the life of the plant, to 60 years, and increased its capacity by 40%.

A major game changer in LNG is the relentless drive to reduce costs – enabled, largely, by technology. Hand in hand, we have seen plant capacity increase, enhancing LNG's competitive position within the gas mix and the overall energy mix.

Technology, in the shape of Gas-to-Liquids (GTL), is also now giving gas resource holders a new choice about what to do with their reserves, offering a most attractive route to monetise gas in remote locations.

The world market for the ultra-clean, emission-free liquids produced in GTL is virtually unlimited. With 350 bcm of gas reserves, you could produce enough GTL to fill only 0.5% of the relevant world market. If you produced the gas as LNG instead, you would have enough to supply 10% of the world LNG market today.

GTL is already economically robust below $20 per barrel. And advances in technology are making GTL more cost effective all the time. I recently returned from Qatar, where Shell signed an agreement build a new GTL plant, on stream in 2009 and producing 140,000 barrels of ultra clean products at a unit operating cost of less than US$4/barrel. But GTL is only at the beginning of the cost reduction creaming curve which LNG has already gone through, so the netbacks to host governments can be expected to increase with time.

GTL is central to Qatar's gas strategy. Indeed, Qatar has declared its aim to be the GTL capital of the world. This project is therefore a major milestone for both Qatar and GTL. With investment of some $5 billion, it's the first world-scale plant in an exciting new industry delivering new products with excellent properties. *(Figure 11)*

This technology gives Qatar and others a new choice. So it changes the game for LNG. And *that* will have repercussions for the whole global gas industry.

Conclusion

Let me conclude by recapping on my four main points: gas markets are becoming

"Technology is enabling us not only to do bigger new projects, but also to make the most of what we have."

"A major game changer in LNG is the relentless drive to reduce costs."

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globally connected; LNG is a critical determinant in how that unfolds; we cannot hope that the lessons we learned in oil are all we need to survive; and we have to recognise the impact political and technological developments will have on market changes going forward.

When we look back, in 20 years' time, I believe three things will have done more than most to change the rules of the game in gas markets as we know them. Those things are: North America's huge demand for LNG imports; the greater competitiveness of LNG due to falling costs; and the impact of GTL as an alternative for monetising reserves, especially in remote locations.

The challenges ahead in gas are considerable. But there is no reason to think that our industry cannot overcome them. And we in Shell intend to be doing just that.

"The direction of changes in the gas market is apparent, but the pace and end-point uncertain..."

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COMHAIRLE CONTAE MHAIGH EO

MAYO COUNTY COUNCIL

MEMORANDUM

TO:	Mr R. Norton, Director of Services Mr P. Hynes, Director of Services Mr S. Granahan, Director of Services Mr J. Beirne, Director of Services/County Engineer Mr I. Douglas, Senior Planner Ms B. Gannon, S.E.P., Planning Section
FROM:	Mr J. Walsh, A.O., Corporate Affairs
DATE:	25th July, 2002
SUBJECT:	FREEDOM OF INFORMATION REQUEST – FOI 287

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Attached please find copy of request for information under the Freedom of Information Act, 1997, received from William Fry, Solicitors, Fitzwilton House, Wilton Place, Dublin 2.

The Freedom of Information Act refers to records created on or after 21st October, 1998.

I would be grateful if you could provide a report on the records as requested to the undersigned not later than Wednesday, 7th August, 2002.

Thanking you.

J. Walsh

NB

J.50 Please respond - all information received with respect to the geo terminal & upstream pipe forms part of the application for planning permission & the £15 is available for inspection etc.

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P01/900

To:
Ms. Breda Gannon + Staff
of Planning + Development
Section, MCC.

Invertebrate professional
conduct is not pleasant to
behold — but, in this post-
Tribunal era the consequences
of such invertebrate
professionalism are not
pleasant to contemplate.

Maura Harrington.

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MAYO COUNTY COUNCIL
RECEIVED
13 AUG 2001
PLANNING & DEVELOPMENT

Comment
year ago still
stands.
Maura Harrington
13 August 2002

SUPPLEMENTARY
MAYO COUNTY COUNCIL
RECEIVED
13 AUG 2002
PLANNING & DEVELOPMENT

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MICHAEL COMMINS' WESTERN DIARY

What we can learn from Indian chief's wise reply

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CHIEF Seattle, a Suquamish Indian who lived on the Puget Sound outside the city that bears his name, was a skilled diplomat and a great orator. In 1854, the 'Great White Chief' in Washington made an offer for a large area of Indian land and promised a reservation for the Indian people. Chief Seattle's reply has been described as the most beautiful and profound statement on the environment ever made.

But over the past three decades, controversy has raged in literary and historical circles about the authenticity of the speech. Many scholars now believe that the words were actually penned by Ted Perry, a screen-writer, inspired by some writings attributed to the Chief, for a 1972 ABC film about ecology. It was delivered at a Southern Baptist Convention that year.

While the statement may be a suitable combination of the thoughts of both the Indian chief and Ted Perry, it is, nevertheless, a superb statement on matters relating to the environment.

In an age where the environment is being vandalised by greed and that most misused word 'development', this article should be cut out and used as a reference for years to come.

How can you buy or sell the sky, the warmth of the land? The idea is strange to us. If we do not own the freshness of the air and the sparkle of the water, how can you buy them?

Every part of this earth is sacred to my people. Every shining pine needle, every sandy shore, every mist in the dark woods, every clearing and humming insect is holy in the memory and experience of my people.

The sap that which courses through the trees carries the memories of the red man. The white man's dead forget the country of their birth when they go to walk among the stars. Our dead never forget this beautiful earth, for it is the mother of the red man.

We are part of the earth and it is part of us. The perfumed flowers are our sisters; the deer, the horse, the great eagle, these are our brothers. The rocky crests, the juices in the meadows, the body heat of the pony, and man – all belong to the same family.

So when the Great Chief in Washington sends word that he wishes to buy our land, he asks much of us. The Great Chief sends word he will reserve us a place so that we can live comfortably to ourselves. He will be our father and we his children.

So we will consider your offer to buy our land. But it will not be easy. For this land is sacred to us. This shining water that moves in the streams and rivers is not just water but the blood of our ancestors.

If we sell you land, you must remember that it is sacred and you must teach your children that it is sacred and that each ghostly reflection in the clear water of the lakes tells of events and memories in the life of my people. The water's murmur is the voice of my father's father.

The rivers are our brothers, they quench our thirst. The rivers carry our canoes and feed our children. If we sell you our land, you must remember and teach your children, that the rivers are our brothers, and yours, and you must henceforth give the rivers the kindness you would give any brother.

We know that the white man does not understand our ways. One portion of land is the same to him as the next, for he is a stranger who comes in the night and takes from the land whatever he needs. The earth is not his brother, but his enemy, and when he has conquered it, he moves on.

He leaves his father's grave behind, and he does not care. He kidnaps the earth from his children, and he does not care. His father's grave and his children's birthright, are forgotten. He treats his mother, the earth, and his brother, the sky, as things to be bought, plundered, sold like sheep or bright beads. His appetite will devour the earth and leave behind only a desert.

I do not know. Our ways are different from your ways. The sight of your cities pains the eyes of the red man. But perhaps it is because the red man is a savage and does not understand. There is no quiet place in the white man's cities. No place to hear the unfurling of leaves in spring, or the rustle of an insect's wings.

But perhaps it is because I am a savage and do not understand.

The clatter only seems to insult the ears. And what is there to life if a man cannot hear the lonely cry of the whippoorwill or the arguments of the frogs around a pond at night?

I am a red man and no dot understand.

The Indian prefers the soft sound of the wind darting over the face of a pond and the smell of the wind itself, cleaned by a midday rain, or scented with the pinon pine. The air is precious to the red man, for all things share the same breath – the beast, the tree, the man, they all share the same breath.

The white man does not seem to notice the air he breathes. But if we sell you our land, you must remember that the air is precious to us, that the air shares its spirit with all the life it supports. The wind that gave our grandfather his first breath also receives his last sigh. And if we sell you our land, you must keep it apart and sacred, as a place where even the white man can go to taste the wind that is sweetened by the meadow's flowers.

So we will consider your offer to buy our land. If we decide to accept, I will make one condition: The white man must treat the beast of this land as his brothers.

I am a savage and I do not understand any other way.

I have seen a thousand rotting buffaloes on the prairie, left by the white man who shot them from a passing train.

I am a savage and I do not understand how the smoking iron horse can be more important than the buffalo that we kill only to stay alive.

What is man without the beasts? If all the beasts were gone, man would die from a great loneliness of spirit. For whatever happens to the beasts, soon happens to man. All things are connected.

You must teach your children that the ground beneath their feet is the ashes of your grandfathers. So that they will respect the land, tell your children that the earth is rich with the lives of our kin. Teach your children what we have taught our children, that the earth is our mother. Whatever befalls the earth befalls the sons of the earth, if men spit upon the ground, they spit upon themselves.

This we know; the earth does not belong to man; man belongs to the earth. All things are connected. Whatever befalls the earth befalls the sons of the earth. Man did not weave the web of life; he is merely a strand in it. Whatever he does to the web, he does to himself.

Even the white man, whose God walks and talks with him as friend to friend, cannot be exempt from the common destiny. We may be brothers after all. We shall see.

One thing we know, which the white man may one day discover – our God is the same God. You may think now that you own Him as you wish to own our land; but you cannot.

He is the God of man, and His compassion is equal for the red man and the white. This earth is precious to Him and to harm the earth is to heap contempt on its Creator.

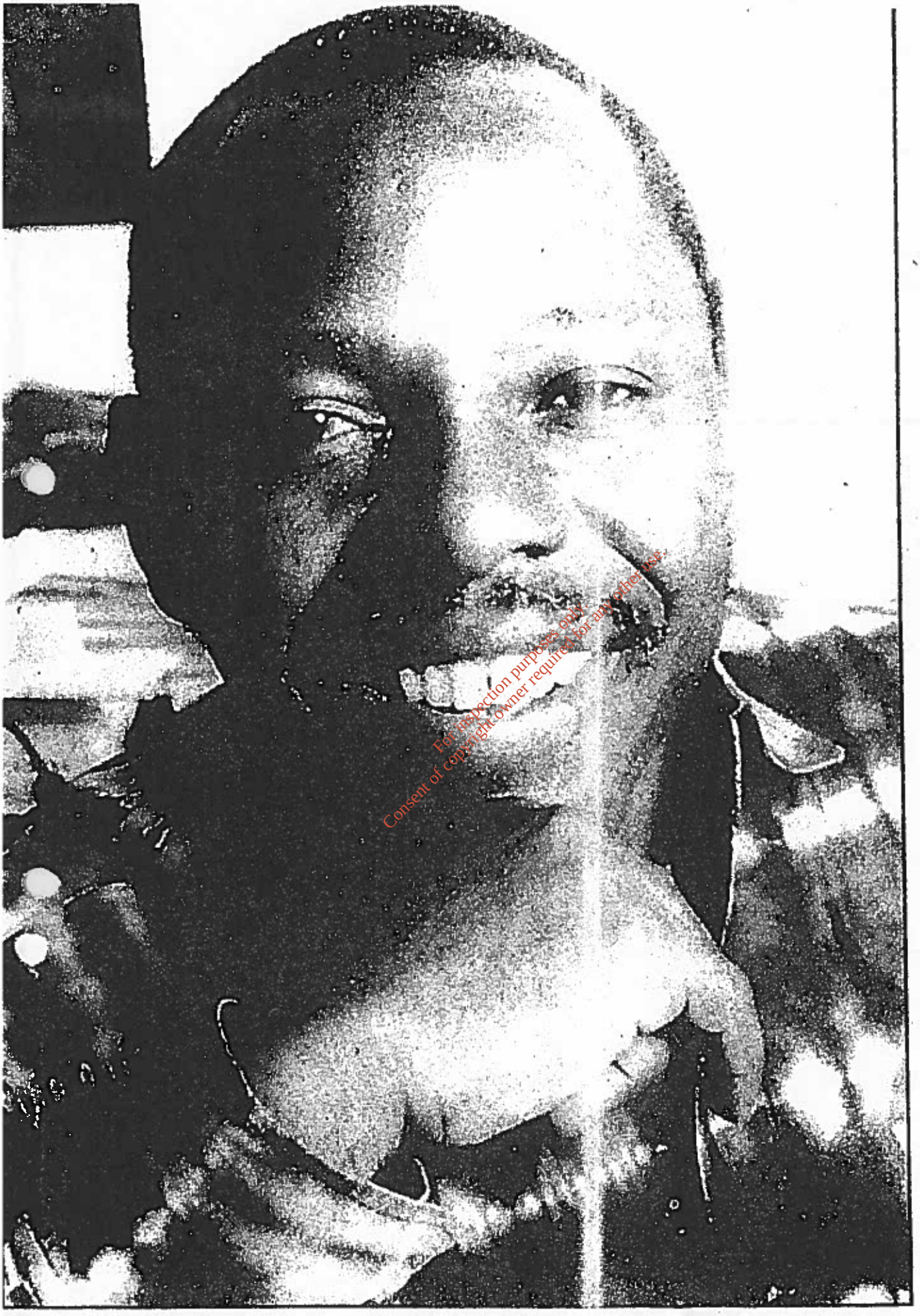
The whites too shall pass; perhaps sooner than all the other tribes. Contaminate your bed and you will one night suffocate in your own waste. But in your perishing you will shine brightly, fired by the strength of the God who brought you to this land and for some special purpose gave you dominion over this land and over the red man.

That destiny is a mystery to us, for we do not understand when the buffalo are all slaughtered, the wild horses are tamed, the secret corners of the forest heavy with scent of many men, and the view of the ripe hills blotted by talking wires.

Where is the thicket? Gone. Where is the eagle? Gone.

The end of living and the beginning of survival."

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KEN SARO-WIWA (1941 — 1995)

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Carne Golf Links

Cúrsa Gailf Chaírn

Belmullet County Mayo Ireland
Tel 097 82292 Fax 097 81477
www.carnegolflinks.ie

Secretary
Planning Permission Office
Mayo County Council

Re: P03-3343

24th January '04

A chara,

Erris Tourism (Holdings) Ltd has decided to make the enclosed submission in support of the Shell/Enterprise Energy application for planning permission in respect of the development of the Corrib Gas Field.

I would be grateful if you would bring this submission to the notice of the officials involved in the planning process.

Yours sincerely

Michael McGarry
Chairman

R no 6564
€20
2/2/04.

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Carne Golf Links
Cúrsa Gailf Chaírn
Belmullet County Mayo Ireland
Tel 097 82292 Fax 097 81477
www.carnegolflinks.ie

Re: P03-3343

Submission

Turasóireacht Iorrais Teoranta was incorporated on 9th May 1985, to promote and develop tourism and the Irish language in the Erris area of County Mayo.

The company's objectives, as set down in its constitution, are to improve the general environment of the area, offer better recreational facilities and provide additional tourism activities and amenities thus increasing employment.

Turasóireacht Iorrais (Gabhaltais) Teoranta is a community based development company and has no restriction on membership numbers. It limits the liability of each member and restricts any distribution of profits or assets to members.It has a board of 20 directors and board members serve voluntarily and take no remuneration for their work on behalf of the company.

The company's flagship project is Carne Golf Links, which is now rated by some golf journalists as being in the top 5 links courses in Ireland. Carne Golf Links has exceeded all our expectations since it was officially opened in 1995. It is responsible for an increasing number of visitors to Erris and acts as a catalyst for further developments in the Erris area. In 2003, over 12,000 golfers played Carne and numbers have been growing significantly each year.

Turasóireacht Iorrais Teoranta has undertaken a number of other projects in Erris since 1985. The company has been successful in securing two blue flag beaches in Erris. It has also taken a long-term lease on the old Protestant church in Belmullet with a view to its restoration and development. In 1991, the company purchased 10 acres of land adjacent to the now blue-flag beach at Mullaghroe on the Mullet peninsula, with an in-shore tourist development in mind. The company has assisted in the publication of a brochure and map showing places of interest in Erris.

Turasóireachta Iorrais also has been active in the promotion of cultural events in Erris. We have assisted in, among other things, through our support of Féile Iorrais, The International Folk Arts Festival. We have also funded Gaeltachta Scholarships for younger people. Turasóireachta Iorrais will continue to support cultural development in the area. We recognise the growing importance of cultural tourism and the role that cultural activities play in improving the overall tourism in the area. We warmly welcome the proposed development of an Arts Centre in Belmullet and will offer what assistance we can in its development. Our company is fully committed to preserving and enhancing the environmental features and tourist amenities in North Mayo.

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Carne Golf Links
Cúrsa Gailf Chaírn
Belmullet County Mayo Ireland
Tel 097 82292 Fax 097 81477
www.carnegolflinks.ie

At it's recent meeting the Board of Erris Tourism welcomed the decision by Shell/Enterprise Energy to reapply for planning permission to develop the Corrib Gas Field.
Our company has consistently supported the development of this resource, which we believe will bring great benefits to this region, Mayo and the county as a whole.

Erris Tourism supports the application for planning permission for the following reasons:

- Tourism in Erris will benefit directly as a result of the influx of people involved with the project in the area.
- Increased accommodation, restaurant, leisure and entertainment facilities will be provided, facilities, which are necessary for the development of tourism.
- Increasing numbers of people will use the facilities provided by Erris Tourism thus increasing employment.
- The landing of the gas would, we are convinced, lead to improved infrastructure in North Mayo: - roads, broadband etc which would be of benefit to tourist interests.
- In the construction phase hundreds of jobs would be provided in Erris with the attendant benefits to the business community.
- When operational, high quality jobs would be provided, jobs, which would lead to the creation of service employment, which would be of huge direct benefit to the local economy.
- Shell/Enterprise Energy has given a commitment to employ local labor where the appropriate skills are available.
- We understand that the development will avail of a wide range of services, which can be provided locally e.g: earth moving equipment, haulage, fabrication, supply of sand & gravel etc.
- There are indications that the development of this resource would lead to the provision of a gas fired Power Station in the area.
- It is also likely that an industrial estate would be developed in this Gaeltacht area, which could avail of a gas supply as a power source.
- Where comparable finds have been made in other parts of the world, downstream industries usually follow – we believe that conditions are right for such an outcome in this case.
- This area of North Mayo is one of the few areas which showed a population decline in the last census. Erris Tourism is of the view that the development of the Corrib Gas Field would lead to the stabilization of the population in this area which is also one of the most economically deprived in the country.

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Erris Tourism is wholly committed to the preservation and enhancement of the local environment here where we live and work. The company does not believe that the development outlined in the Shell/Enterprise Energy application for planning permission will be damaging to the environment.

We welcome the fact that Shell/Enterprise Energy consulted widely with the local community before applying for planning permission and that the application reflects the views expressed in that consultation.

Erris Tourism believes that for the above reasons planning permission should be granted to Shell/Enterprise Energy for the development of the Corrib Gas Field as outlined in their planning application. We believe that we are reflecting the views of the vast majority of people in the North Mayo area in supporting this application.

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The Board of the company voted uanimously at the monthly Board meeting on 22nd January 2004 that we should make this submission in support of the application.

Michael McGarry
Chairman

PLANNING

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Councillor Gerry Coyle
Doolough ,
Geesala ,
Ballina ,
Co. Mayo
Tel / Fax ; 097 ~ 82280 .
e-mail ; cllrgerrycoyle@eircom.net

Planning Section
Mayo Co. Council.
Arás an Chontae
Castlebar
Co. Mayo .

€20
30/1/04
Rno 65/12
Cash.

27th January 2004.

Re ; Planning Ref P 03 / 3343

Dear Sir,

I would like to state my support for the Corrib Gas Project through the building of an On-Shore terminal at Ballinaboy and the removal of the peat to the Bord na Mona site at Srahmore / Attavally , Bangor Erris. I strongly believe that the project will bring major benefits to the Erris/ Mayo area and that it will be carried out through the proper planning and development as laid down in the County Development Plan of Mayo County Council. In my support of the project I am conscious of the concerns of the residents adjacent to the plant but I feel that their concerns can be adequately addressed.

Yours sincerely,

Gerry Coyle.

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Cumann Lúth Chleas Gael
CUMANN CILL TSÉADHNA

CHAIRMAN:
Richard Cosgrove,
Bangor Erris,
Ballina,
Co. Mayo.
TEL: (097) 83494.

SECRETARY:
Susan Calpain,
Doohoma Head,
Ballina,
Co. Mayo.
TEL(097) 86917.

JOINT TREASURERS:
Caroline Scanlon,
Dooyork, Geesala,
Co.Mayo.
TEL: (097) 86845.
Richard Cosgrove.

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To Whom It May Concern.

Kiltane G.A.A. Club is totally supportive of the effort currently being undertaken by Shell E&P to bring ashore Corrib Natural Gas. The Erris and North Mayo region is desperately in need of a major jobs boast. We believe that were this project to be given the green light, it would not alone provide huge employment but would also lead to the development of the region in terms of road infrastructure, telecommunications, tourism as well as an overall general knock on effect in the services area.

We therefore genuinely urge Mayo County Council and any other decision making body that may be involved in this process to allow it to proceed, not alone for the good of the area but also for the country as a whole.

Yours Faithfully,
Susan Calpain
Susan Calpain.

Rec. 6514 cash
E20 –
30/11/04

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Reports 03/3343

DUCHAS - sending report in today as per telephone call 29th January, 2004.

NWRFB - preparing report today 29th January, 2004.

AN TAISCE - sending report in today as per telephone call 29th January, 2004.

EPA – Wexford – Rang Wexford and they say Dublin Office dealing with Report

EPA – Dublin – Rang office in Dublin - a Michael Daly – left message on voice mail, 29th January, 2004

DEPT. OF THE MARINE – Rang office on 29th January, 2004. Left message on voice mail requesting report be returned.

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Fiona Fay
29/1/04

SCANNED

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BUSINESS SUPPLIES
GARDEN STREET, BALLINA, CO. MAYO.
Tel: (096) 72755. Fax: (096) 72823 Date.....

General Printing
Office Stationery
Office Furniture Shop Supplie
Point of Sale Fax Rolls etc

27th January 2004,

6469
£20 cash
29/1/04

Planning Dept.,
Mayo County Council,
Castlebar,
Co. Mayo.

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TO WHOM IT CONCERNS

Ref: Corrib Gas Development

As a local business we have had dealings with O.S.S.L. in Bangor Erris who have been associated with the above project since they came to the area some years ago and have found them to be a reputable company.

We support the above development in that we feel it should be of economic benefit to the area and could create much needed employment.

E. Ormsby
Business Supplies

29 JAN 2004
PLANNING & DEVELOPMENT

Directors: P. O'Hora, K. O'Hora

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LENNON QUARRIES LTD.

Glencastle,
Bunnahowen,
Ballina,
Co. Mayo

Tel: (Office) 097-81297
Fax: 097-81734
Mobile: 087-2545364
Email: lennonquarries@utvinternet.com
VAT No: IE 8263357 I

Suppliers of High P.S.V. Road Chippings, Crushed Stone, Sand & Gravel, Ready Mix Concrete.

646
€20 cash
29/1/'04

Mayo planning Department,
Mayo County Council,
Castlebar,
Co. Mayo.

28/01/'04

Ref: SHELL EMP IRELAND.
CORRIB GAS.

To whom it concerns,

Lennon Quarries fully endorses and supports the development of the Gas terminal at Ballnaboy.

We feel that the project will benefit both our company and it's employees as well as the wider community of the Erris region in the economic spin-off which the project's construction will generate.

In our view it is an unprecedented opportunity to bring development to this region of north Mayo which simply must be seized.

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Regards

P. P. Bernard McDermott

TJ Lennon.
Lennon Quarries Ltd.

29 JAN 2004

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Sizzlers

Restaurant & Outdoor Catering

6467
€20 cash
29/1/'04

24th January 2004,

Mayo County Council,
Planning Department,
Castlebar,
County Mayo.

29 JAN 2004

Attn. : Planning Officer,

Reference : Corrib Gas Project – Proposed Gas Terminal (Bellanaboy)

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Dear Sirs,

Reference the above application we write to inform you of our support for this development.

As a local employer we know the need for additional activity in the area which would create much needed employment for existing and future staff.

We have had the pleasure of dealing with the people involved (Shell E &P) over the past number of years and their presence in our street is very welcome, we look forward to doing more business in the very near future.

Yours Sincerely

Patrick Winters

Patrick Winters



Main Street - Bangor-Erris - County Mayo

Telephone : 097 - 83495

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27th January 2004

IRISH BUSINESS AND EMPLOYERS CONFEDERATION
IBEC

WEST REGIONAL OFFICE:
ROSS HOUSE,
VICTORIA PLACE,
GALWAY.
TELEPHONE:
(091) 561109
FACSIMILE:
(091) 561005
e.mail:galway@ibec.ie
www site:http://www.ibec.ie

The Secretary,
Mayo County Council,
Planning Section,
The Mall,
Castlebar,
Co. Mayo

30/1/04
R no 6510
€20 Chq

Re: Planning permission for the Corrib Gas project

Dear Sir/Madam,

On behalf of the business and employer community in the West Region, IBEC West supports the granting of planning permission for the Corrib Gas project proposed for Bellanaboy Bridge, Co. Mayo.

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BACKGROUND:

The IBEC West Region, which incorporates Mayo, Galway, Roscommon and Athlone has not benefited to the same extent as other regions from the excellent economic performance of recent years. Despite record rates of growth nationally, economic growth, as reflected in industrial performance and employment growth in the region is limited and lags far behind more developed regions.

Industrial Output: Industrial activity in the IBEC West Region is smaller in scale than that in the Eastern and Southern region as measured by the value of output per local unit and per person. Nationally, net industrial output grew by 14.6% per annum between 1991 and 1998; the equivalent figure for the IBEC West Region was just 2.82%.

DIRECTOR GENERAL:
TURLOUGH O'SULLIVAN

REGIONAL DIRECTOR:
JOHN BRENNAN

IR/HR EXECUTIVE:
RONNIE LAWLESS
LOUISE BOYLE

BUSINESS DEVELOPMENT EXECUTIVE:
AIDAN CARNEY

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In 1991, the IBEC West Region accounted for 10.92 per cent of all industrial output in the state. This proportion declined to 6.61 per cent in 1996 and 5.03 per cent in 1998. All counties in the IBEC West Region experienced a decline in their share of net national output between 1991 and 1998. In contrast the Eastern and Southern region increased its share of national net output from 69 per cent in 1991 to nearly 81.9 per cent in 1998.

Employment Distribution: There was an increase of 6.6 per cent in the numbers employed in the West Region between 1998 and 2000, which is well below the state average of 11.8% for the same period. Given the West Region's relative position, it needs better than average growth rates..

The National Spatial Strategy (NSS): The NSS is suggesting that the development of the Regions will benefit the entire country and will reduce the pressure caused by increased migration to Dublin. It will help reduce the demand for housing and major affordability difficulties, which have arisen in recent years and it will also reduce the pressure on transport infrastructure in the capital.

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However, in order to recognise this potential there must be a concerted effort to deliver on the major investment priorities for the regions. Our ability to overcome well-known infrastructural bottlenecks will determine the extent to which we can achieve strong and sustainable economic performance in the region.

- ***The delivery of cost-effective, reliable and secure sources of natural gas is key to sustaining economic growth.***

Over the last decade, the importance of natural gas as a source of energy to the Irish economy has dramatically increased with gas consumption growing by a compound rate of 5.6% per annum over this period. Gas is currently used to generate 32% of electricity production in Ireland and this is projected to increase to almost 70% by 2010.

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THE CORRIB FIELD:

IBEC welcomes the application to develop a terminal to support the Corrib Gas Field. We see the development of the gas field as critical to business, foreign direct investment and regional development. The Corrib Gas Field is the biggest offshore gas discovery after Kinsale and is estimated to contain enough gas to meet 60% of national demand for up to 20 years.

The offshore exploration failure rate in Ireland has been very high since the discovery of the Old Head of Kinsale field 30 years ago. Then, against the odds, in 1996 the Corrib Field was discovered in 350 metres of water a further 3,500 metres below the seabed. This is some of the most inhospitable waters in the Northern Hemisphere and storms with 30 metre waves are frequent. In the circumstances and considering the technical challenges, associated development and operating costs the decision to proceed with the development was taken only after the most serious consideration.

- ***However, the planning bureaucracy to-date has proved a much bigger unpredictable obstacle than the elements and the engineering challenges.***

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In the national interest the development of the Corrib Gas Field should be completed with urgency to ensure the benefit to the economy and to the environment, through the availability of additional clean natural gas.

Yours sincerely

JOHN BRENNAN
Regional Director

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APPENDIX 1

Agencies and Departments with similar policies and objectives are:

- **The BMW Assembly** "believes that the case for extending the Corrib gas pipeline to further towns in the region is very strong and should be supported by Government".

- **The Western Development Commission** has argued that natural gas is an essential infrastructure and that it is necessary to expand the network in the region to enable it to compete with other parts of the country that already have access to natural gas. It has also pointed out that the route of any pipeline should be such as to maximise the number of towns with access.

- **Mayo County Council**[1] "fully supports the realisation of the Corrib Gas Field find" and it fully conforms to the new Mayo County Development Plan 2003 – 2009.

- **The Department of Communications, Marine and Natural Resources** objective in ensuring that the energy sector contributes fully to the Governments objectives in promoting regional development and enhancing social inclusion "it has been decided in principle that the network should be extended to Sligo via Ballina from the proposed Mayo/Galway pipeline"

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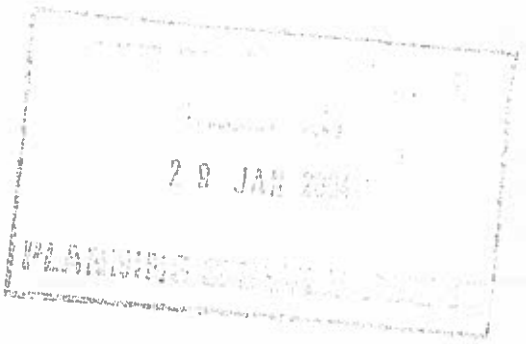
[1] Mayo County Development Plan 2003 - 2009

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6468
€20 cash
29/1/04

Desmond Kane,
Teach Ciaran,
Main Street,
Bangor-Erris,
County mayo.

Date : 29Th - January - 2004



Mayo County Council,
Castlebar,
County Mayo.

Attention : Planning Department

Subject : Corrib Gas Project - Shell E & P - Bellanaboy Gas Terminal

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Dear Sir's,

I Have worked for Shell and their associates in the Oil and Gas industry on both Onshore and Offshore Projects in many parts of the world.

Before returning to Ireland in 1998 I was working on the construction of a gas terminal similar to the proposed terminal at Bellanaboy, the location of that project was in the Western Desert - Egypt.

It may interest you to consider to following.....

- They employed eleven hundred persons over a four year period - eight hundred of which where local Nomads.
- Shell's obsession with safety ensured not one fatality occurred over the four year construction period.
- Unskilled Egyptian men and women who showed willing where sent abroad to other Gas plants in various parts of the world to be trained for the safe production and running of the completed Egyptian Plant.

  This was an opportunity that would have never been possible where it not for Shell's policy of employing locally whenever possible.
- Two years after completion of the plant a work force of one hundred and forty five, entirely Egyptian, all trained by Shell, all well paid - long term jobs.

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With a opportunity such as the Corrib Gas Plant being made available to the people of Mayo and with all the correct checks and procedures being laid down by Mayo County Council this is a opportunity that must be grasped with both hands and secured for young local men and women who will be offered the same opportunities to be trained for worthwhile long term jobs at the Bellanaboy Gas Plant.

Yours Sincerely

Desmond Kane

Telephone : (00353) 086 828 7690

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Aesthetic Services Ltd.

Behymore,
Ballina,
County Mayo,
Ireland.
Tel: 1850-200-643,
Fax: 096-22554.
Email: Aesthetics@eircom.net.

€20 cash
29/1/04
@ 6475

Handy-Hut-Hire
Portable Toilets.
27th January 2004

Mayo Co. Council,
Planning Dept.,
Aras an Chontae,
Castlebar.

A Chara,

We wish to express our support for the planning application for the proposed gas terminal at Ballinaboy, Co.Mayo by Shell EP.

We have been doing business with this company and formerly with Enterprise Energy for a number of years and have found both to be very conscious in relation to environmental protection. They demand the highest standard with regard to health and safety.

We hope you take our views into consideration when making the final decision as we feel this project would greatly benefit the West of Ireland.

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Yours Sincerely,

Paddy Ruddy.
Paddy Ruddy M.D.

Rita Ruddy
Rita Ruddy Dir.

B. Ruddy.
Brenda Ruddy Secretary.

EPA Export 08-07-2014:23:49:42

Frank Brogan Limited.

BUILDERS & PROVIDERS
EUROSPAR



MAIN STREET • BANGOR ERRIS • BALLINA • CO. MAYO.
Telephone: (097) 83498 / 83597 Fax: (097) 83498
ALSO TALLAGH, BELMULLET, CO. MAYO.
Telephone: (097) 81608 / 82349 Fax: (097) 81608

Our Ref: Date:

Your Ref:

29/01/04

I would like to acknowledge the dedication and hard work of all those involved in the Corrib Gas Project, and to offer my support of their endeavour.

Being in business in the region and employing 45 people, I am confident the success of this project would bring great prosperity to the area.

This project to date has being a very long process and it would be appreciated if an attempt was made to speed up the outcome, hopefully a positive one.

Yours faithfully

Frank Brogan

P.P.

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29 JAN 2004

fw 6465
€ 70 cash
29/1/04

EPA Export 08-07-2014:23:49:42

Ardnaree Tool & Plant Hire Ltd.

Abbey Street,
Ballina,
Co. Mayo.
Tel.: 00 353 96-70630.
Fax: 00 353 96-72222.
E-Mail: ardnaree.toolhire@oceanfree.net

€20 cash
29/1/'04
Pw: 6474

27/01/2004.

Planning Board,
Mayo County Council,
Aras an Chontae,
Castlebar,
Co.Mayo.

A Chara,

We would like to voice our support for the proposed Gas Reception Terminal at Bellanaboy, Co.Mayo. We strongly support this Project, we believe that the proposed development will have a very positive influence in generating much needed employment in North Mayo and in promoting growth both economically and socially in the area.Harnessing this Natural Resource of North Mayo in an environmental friendly medium surely can only result in a better way of life for the people of North Mayo.

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Yours sincerely,

Valerie Horan.



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E-mail:
tomoconnorhygienesupplies@eircom.net
Website:
www.hygienesupplies-mayo.com

TOM O'CONNOR
HYGIENE SUPPLIES

62 CHILDERS HEIGHTS
BALLINA,
CO. MAYO.
TEL.\FAX: 096-73627
MOBILE: 086-8121015

€20 cash
29/1/04
Rw 6476

Date: 26/01/04

Mayo Co Council
Planning Dept
Castlebar
Co Mayo.

Re: Corrib Gas Project- Belmullet Co Mayo

Dear Sirs ,
As a local based business and an employer we are dependant on new industries and very much welcome all new enterprises to this area.
At present we receive considerable support from this project and feel confident that our business and others would benefit immensely from having this project located and operating in our region.

This matter in my opinion has been drawn out far too long and I feel that every assistance should be given to speed up this matter to enable the company and business people etc to plan for the future. As a businessman and local employer I feel that this project would be of enormous benefit to the area and would offer considerable long term benefits and very welcome additional employment.

I very much appreciate the support given to our local business from this project to date and look forward to future growth in our business in the long term.

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Yours Sincerely

Tom O'Connor (Owner)

RECEIVED
29 JAN 2004
PLANNING & ENVIRONMENT

A local business providing a local service

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FEASTA Submission

To: Mr. Ian Douglas, Planning Office, Mayo County Council.

Re: Gas Terminal Planning Application, Bellanaboy, Co. Mayo.

Date: January 29th, 2004.

FW: 6485
Enc
29/1/04



Dear Mr. Douglas,

The following is a brief submission by Feasta on the application by Shell E. and P. to construct a Gas Processing Plant at Bellanaboy Bridge, Co. Mayo. Feasta, The Foundation for the Economics of Sustainability, was established in 1998. It aims to explore and promote the characteristics – economic, cultural and environmental – that a society must have in order to be truly sustainable.

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While there are many issues of concern regarding this application, Feasta's primary focus in this submission is on questions of sustainability, specifically that of energy. The applicant is asserting that there is a need for the project; that the project is consistent with government policy; and that the proposal amounts to 'sustainable' development. For the reasons briefly outlined below, Feasta submits that none of these assertions are valid and that, accordingly, you reject the planning application.

1. The proposal by Shell is to construct a gas processing plant in order to exploit in full reserves of natural gas off the Mayo coast. Feasta's submission is that there is no demonstrable national need to do this; that the proposal conflicts with stated government, European and international policy on fossil fuel use; and that the national need is not served by an immediate exploitation of the gas supply.

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2. There is no demonstrable national need to exploit the Corrib gas reserves at this time. On the contrary, the construction of a second natural gas Interconnector between Ireland and Britain has ensured a continuity and security of supply. This is stated clearly in Bord Gas Eireann's Annual Report for 2002. No threats to supply exist at present or for the foreseeable future. The applicant's styling of the Corrib Gas reserves as 'indigenous' is irrelevant due to this gas having to be purchased at full market price by any prospective local buyer. The consequence of the exploitation of the Corrib reserves is simply to grossly over-supply an already replete Irish gas market. Corrib gas is simply not *needed* at this time.

3. The policy framework for any planning decision, including one on the exploitation of fossil fuels, is outlined in a number of documents. It includes international commitments entered into by Ireland and the European Union. These are comprised of, among others, the United Nations Framework Convention on Climate Change which includes the Kyoto Protocol and the Agenda 21 commitments made in Rio in 1992. Also relevant is the Gothenburg Protocol to the Convention on Long-Range Transboundary Air Pollution. Additionally, EU law and policy including the 6th Environmental Action Plan and the Gothenburg Process must be considered. At national level, the National Sustainable Development Strategy, the National Climate Change Strategy and the National Spatial Strategy give significant national policy guidance. We believe that the implementation of the principle of Sustainable Development, which underpins all of the laws and policies referred to above, means not extracting the gas now.

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4. The critical policy context within which this application should be examined is that of climate change and future fossil fuel depletion. Both of these factors combine to impose upon us the obligation now to develop new, renewable forms of energy. Indeed, government policy as stated in the National Climate Change Strategy gives full support to this approach. The immediate exploitation of natural

EPA Export 08-07-2014:23:49:42

gas supplies would merely continue the country's reliance on fossil fuels and further postpone our necessary transition to renewable energy sources. To this extent it is in conflict with the thrust of national and international energy policy. The argument of the applicant that natural gas is 'environmentally friendly' because it is a source of less carbon gases than coal or oil misses the point completely.

5. A transition to sustainable forms of energy use is a core national policy. Extracting the gas and feeding it into the current system will merely prop up that system. However, because of the extent of the changes needed to move to a different energy system, there would be a significant role for this gas to be invested in fuelling aspects of the transition to sustainable patterns of energy use. Accordingly, the national need and the agreed national policy goals would be better served by either of the following positions:

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5.1 The Corrib gas supply should be retained by the State as a strategic reserve against a future, sudden loss of fossil fuel supplies.

5.2 The Corrib gas supply should be retained until it can be utilised as part of a transition process to construct and create new structures for the generation and dissemination of renewable energy and renewable energy systems. That is, it should only be invested in effecting a transition to wider energy sustainability.

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It is not of course for the Council to make national policy. But in arriving at a planning determination, you are obliged to take account of national policy and wider national needs. In this submission, Feasta argues that these are best served by a rejection of Shell's application. The Corrib gas supplies are a precious resource that should be used wisely and sustainably in the interests of all the people of Ireland rather than being squandered for the short-term interests of a global oil and gas corporation.

Yours sincerely,



Mark Garavan and David Healy,
Feasta,
159 Lower Rathmines Road,
Dublin 6.

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Ph. 0866016011
Fax 097 87826

€429
€20 ch.
25/1/04

Martin McManamon
Glenturk
Bangor-Erris
Ballina
Co. Mayo

P03/3343

26th Jan. 2004

Planning Department
The Mall
Castlebar
Co. Mayo
CC. Shell office, Bangor-Erris
CC. Shell Head office, Dublin

Dear Sir/Madam

I wish to object to the Proposed Ballanaboy Bridge Gas Terminal and associated Srahmore Peat Deposition Site. My objection relates specifically to the transportation of 450,000m³ of peat from the gas terminal to the peat deposition site.

The proposed route to be used in this transportation process bisects my farm. This development will generate c.800 trips per day for 6 months. This will have a significant negative impact on my residential amenities and will also cause extreme difficulties for the daily inspection of my farm. The traffic generated will cause a traffic hazard and be a major obstruction to alter road usage.

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What is of particular concern to me is the impact this traffic will have on my elderly ill mother. She requires regular medical attention and needs to frequently visit her GP a distance of 5 miles away. The traffic generated by the development will make these essential GP visits a nightmare. My sister also calls daily to our home to help take care of my mother. These daily visits from my sister will also be seriously impeded upon by the development. If emergency treatment is required this access to our home will be made very difficult by the c.42 trucks per hour on the public road. My mother has respiratory problems and as her house is only 20 yards from the road, I am worried that air born particles and fumes from the trucks will affect her health.

Yours sincerely

Martin McManamon

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JAMAL DEVELOPMENTS LTD
BANGOR ERRIS
BALLINA
CO. MAYO

EN: 6464
€ 20 cash
29/1/04

29/01/04

Dear Sirs

I am writing this letter to offer support to the Corrib Gas Project and all those involved.

I am a local employer, employing primarily returned emigrants from America and England, I realise the many positive aspects this project would have on this area; in particular it offer prosperity and perhaps will help more of our skilled emigrants return.

Your faithfully

James Carabine

James Carabine.

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Barrett's Quarry & Plant Hire

Bangor Erris, Ballina, Co. Mayo
Tel: 097 83577 / 83978
087 2226243
Fax: 097 83577

€47C
€20 cash
29/1/'24

Re: Corrib Gas

For inspection purposes only.
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To Whom It May Concern:

We at Barrett's quarry and plant hire are in favour and support the gas project. It is our opinion that the area will benefit from it.

Yours sincerely,

Paddy Barrett.

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School of Health Science,
GMIT,
Westport Road,
Castlebar,
Co. Mayo

Rec. 6487
€ 20 cash
29/1/04

MAYO COUNTY COUNCIL
RECEIVED
29 JAN 2004
PLANNING & DEVELOPMENT

29.01.04

Dear Mr. Douglas,

This letter is by way of submission on the application by Shell E. & P. to construct a gas processing refinery at Ballanaboy, Co. Mayo. There can little doubt that if this application is assessed according to strict and proper planning criteria it must be refused. The insertion of a large-scale industrial facility into a rural, scenic, ecologically sensitive and non-industrialised setting, with poor road and support infrastructure, is not tenable in planning terms. I wish to make a number of brief observations.

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1. This application, both in scale and technicality, is unprecedented. For example, the removal of 450,000 cubic metres of wet peat has never before been attempted in this way or at this pace. It is therefore incumbent upon you to first, investigate any comparable developments in order to build a dossier of relevant data and assessment criteria, and second, to engage outside expertise to assist in forming an appropriate judgement on the methodologies proposed in the application.
2. In forming your professional assessment you must, I believe, pay close attention to the Reports of the An Bord Pleanala Inspector into the previous application for a gas processing plant. Those Reports were the results of an intensive investigation into the application and amount to a serious criticism of the proposal across a range of planning criteria. Many of these criticisms remain valid for this renewed application. Bord Pleanala did not dissent from these criticisms of the

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application. If you choose to approve the project then you will have to demonstrate clear and good reasons to deviate from the weight of professional planning opinion on this project.

3. Given that the application has been judged untenable in planning terms then the only possible justification for its proceeding centers on a conception of the 'national interest' and on a particular reading of government policy. Indeed, these were the only reasons why An Bord Pleanala were prepared to overlook the proposal's numerous planning deficiencies. In fact, this is a spurious and ill-founded argument as will be demonstrated clearly to An Bord Pleanala in the event of an appeal. I submit that you must ground your decision on strict planning criteria and not permit the marginalisation of your function by invalid political considerations.

4. The general planning defects of the application are numerous and well-known. Indeed, this present application is far worse than the previous one. I shall mention only two aspects briefly:

   4.1 The road network is simply incapable of accommodating the traffic which this project would give rise to. To attempt to proceed with this extraordinary engineering experiment on the road network in the Ballanaboy locality would create an unacceptable risk environment for all in the area. Rendering this part of Mayo into a twenty kilometer long construction site (i.e. from Glengad to Srahmore) would be the height of irresponsibility. No adequate testing has been conducted into the capacity of the road network to sustain the new traffic load nor into the social and economic effects of this increase on the local population.

   4.2 There is no rigorous description of the peat removal and drying methodologies. These are purely conceptual. No precedents, no testing and no criteria by which the peat can be adjudged sufficiently dry and therefore capable of safe removal are outlined in the application.

These matters and others will be outlined in greater detail in the event of an appeal to An Bord Pleanala.

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5. In order to render this badly conceived application viable, the applicant is obliged to sequester almost 800 acres of land in both Ballanaboy and Shrahmore. The applicant is obliged to remove half a million tonnes of saturated peat slurry, render it into 'waste', dry it out sufficiently for safe removal, fill in the resulting hole with thousands of tonnes of imported material, and dump the resulting 'waste' eleven kilometers away. All of this is to be done in order to facilitate the construction of an enormous industrial facility in a rural area surrounded by three SACs. By no stretch of the concept could this be regarded as 'sustainable development'.
6. The site selected is so patently wrong for the application proposed that I have no doubt a decision to approve it would give rise to one of the most extraordinary case studies of bad planning practice yet available to planning, engineering and construction professionals and academics. Let the planning file show as a matter of record that this was clearly understood by many from the beginning.

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Yours sincerely,

Mark Garavan.

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98 Lindsay Rd,
Glasnevin,
Dublin 9.
018304568
26th January 2004

To: Planning Department,
Mayo Co. Council,
Castlebar,
Co. Mayo.

R.E: Planning submission ref.033343, Bellagelly South, Shramore, Attavally.

Dear Sir or Madam,

I enclose copies of objection to the above planning submission together with accompanying fee. Please acknowledge receipt.

Yours Faithfully,
Bernard Grimes.

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SCANNED

Rec 6/1/04
€20
29/1/04

EPA Export 08-07-2014:23:49:42

To: Planning Department,
Mayo Co. Council,
Castlebar,
Co. Mayo.

98 Lindsay Rd,
Glasnevin,
Dublin 9.
018304568
26th January 2004

R.E: Planning submission ref.033343, Bellagelly South, Shramore, Attavally.

I wish to object to the above planning application by Royal Dutch Shell as it is not in line with the proper planning and development for the county in the following respects:

As defined by Mayo County Council's Development Plan, this site is part of, or adjoins, Special Areas of Conservation, Special Protection Areas and National Heritage Areas. It is bounded by Designated Scenic Routes, and lies within Policy Area 1 ("particularly sensitive to inappropriate development"). The plant proposes to discharge its waste into Broadhaven Bay, a Marine Special Conservation Area. The waste discharged will endanger marine life in the Bay, the livelihood of its fishermen and the future value of the Bay as a recreational and tourist amenity.

The proposal fails as required and stated in the Development Plan to have " Due regard to environmental protection and the preservation of visual, scenic and residential amenity" nor does it " provide for new development without compromising the nature preservation of the designated sites."

The site is unserviced and not zoned for large-scale industrial use. The increased volumes of heavy traffic resulting of the transportation of peat will lead to disruption and traffic hazard on an unsuitable local road network. The ecological and environmental consequences of the large-scale removal of bog and its redeposition are not in the interests of proper planning and development.

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An application of The Draft County Development Plans impact assessment matrix scores the proposal as follows:

	Range	Assessment
Impact Potential	19-24	Highest Impact Potential
Sensitivity	16-20	Highest Sensitivity Index

These results should lead the developer following this assessment process to "Consider Alternative Site".

The proposed development is contrary to the following Draft Development Plans' Development Objectives:

DF-DH1, DF-DH4, DF-T3, DF-RA4, DF-RA6, EA-IE1, EA-IE2, EA-F1, EA-T1, EA-T2, EA-E1, TI-LUT1, TI-R2, TI-HGV1, EH-G1, EH-G2, EH-NH1, EH-NH2, EH-NH3, EH-NH4, EH-NH5, EH-LC1, EH-LC2, EH-VP1, EH-WQ1, EH-AQ1, EH-NP1.

Yours Faithfully,
Bernard Grimes B.Arch.

EPA Export 08-07-2014:23:49:42

98 Lindsay Rd,
Glasnevin,
Dublin 9.
018304568
26th January 2004

To: Planning Department,
Mayo Co. Council,
Castlebar,
Co. Mayo.

R.E: Planning submission ref.033343, Bellagelly South, Shramore, Attavally.

I wish to object to the above planning application by Royal Dutch Shell as it is not in line with the proper planning and development for the county in the following respects:

As defined by Mayo County Council's Development Plan, this site is part of, or adjoins, Special Areas of Conservation, Special Protection Areas and National Heritage Areas. It is bounded by Designated Scenic Routes, and lies within Policy Area I ("particularly sensitive to inappropriate development"). The plant proposes to discharge its waste into Broadhaven Bay, a Marine Special Conservation Area. The waste discharged will endanger marine life in the Bay, the livelihood of its fishermen and the future value of the Bay as a recreational and tourist amenity.

The proposal fails as required and stated in the Development Plan to have " Due regard to environmental protection and the preservation of visual, scenic and residential amenity" nor does it " provide for new development without compromising the nature preservation of the designated sites."

The site is unserviced and not zoned for large-scale industrial use. The increased volumes of heavy traffic resulting of the transportation of peat will lead to disruption and traffic hazard on an unsuitable local road network. The ecological and environmental consequences of the large-scale removal of bog and its redeposition are not in the interests of proper planning and development.

For inspection purposes only.
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These results should lead the developer following this assessment process to "Consider Alternative Site".

The proposed development is contrary to the following Draft Development Plans' Development Objectives:

DF-DH1, DF-DH4, DF-T3, DF-RA4, DF-RA6, EA-IE1, EA-IE2, EA-F1, EA-T1, EA-T2, EA-E1, TI-LUT1, TI-R2, TI-HGV1, EH-G1, EH-G2, EH-NH1, EH-NH2, EH-NH3, EH-NH4, EH-NH5, EH-LC1, EH-LC2, EH-VP1, EH-WQ1, EH-AQ1, EH-NP1.

Yours Faithfully,
Bernard Grimes B.Arch.

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BORD GÁIS ÉIREANN
Planning Section,
Ground Floor,
Mayo County Council,
Aras an Chontae,
The Mall,
Castlebar,
Co. Mayo

Head Office:
P.O. Box 51,
Gasworks Road,
Cork.
Telephone (021) 4534000
Fax (021) 4534001

BORD GÁIS

Date: 23rd January 2004

€20
RD 6495
29/1/04

RE: P03/3343

Dear Sir/Madam,

We refer to planning application file reference number **P03/3343** and would like to offer our support to the planning application for the Corrib Terminal.

This development will help support the existing natural gas national network and provide an alternative source of indigenous gas supply into Ireland thus reducing our dependence on gas imports in a tightening European gas supply scenario which has become more dependant on gas supplies from as far a field as Russia and other external gas supply sources.

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For inspection purposes only.

Gas is currently brought into Ireland at Inch, County Cork (approximately 30% of Irish demand) and through the Irish UK Interconnector pipelines (from Moffat in Scotland to Loughshinny in Dublin - approximately 70% of Irish demand). The Corrib gas field if available would provide security of supply in the event of restricted or no gas flows through Inch or the Interconnector. It would also help make us more energy self-sufficient, should help reduce energy costs in Ireland and provide further security of supply for our domestic and industrial customers including power stations.

The Corrib gas field could potentially help make Ireland more industrially competitive and will reduce our dependence on imported energy supplies.

We hope that in considering the application you would have regard for our concerns as an Irish gas supply company acting in the interest of our Irish customer base.

We enclose cheque for €20.00 made payable to Mayo County Council.

Please acknowledge receipt of this letter and the enclosed cheque.

Yours sincerely

Aidan O'Sullivan
Energy Procurement Manager
Bord Gáis Energy Supply

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Sean Barrett Haulage

Ballina, Co Mayo.
Tel: 096 72805 / 087 9690046

6473
Excel
29/1/04

RE: Corrib Gas

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To Whom It May Concern:

I support the gas project as I feel it will greatly benefit the area.

Yours sincerely,

Sean Barrett





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6472
€30 cash
29/1/04

M & J CARABINE LTD
SPAR SUPER MARKET
BANGOR ERRIS
BALLINA
CO MAYO

29/01/04

Dear Sirs

I wish to express my support for the Corrib Gas Project and all those involved in their attempts to bring progress and prosperity to an area that feels left behind, while other parts of the country have prospered.

Being in business in the region and employing 20 people I am fully aware and appreciative of the positive impact Corrib Gas would have on this area.

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Yours truly,

Amanda Carabine

Amanda Carabine

29 JAN 2004

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OSSL ***ACTIVE PROJECT SUPPORT***

ATLANTIC HOUSE - MAIN STREET - BANGOR-ERRIS - COUNTY MAYO
TELEPHONE : 086 – 8286594 – FAX : 097 – 83961
EMAIL : osslbangor@hotmail.com

047
Exp card 29/1/04

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29 JAN 2004

28th January – 2004

Mayo County Council,
Planning Board,
Castlebar,
County Mayo.

Reference : Shell E & P - Proposed Gas Receiving Terminal, Bellanaboy, County Mayo.

Dear Sir or Madam,

We wish to take this opportunity to voice our support for the Proposed Gas Terminal at Bellanaboy, County Mayo.

As a company we have been actively involved in the modest work that has been carried out on this project so far, and this work has been crucial for the development of a small Erris based company.

In respect of safety matters we witness on a daily basis an unequivocal "No Nonsense" approach in all scopes of work, a theme that will continue during construction of the Gas Terminal and beyond.

The high degree of assistance we have received from the applicant (Shell E & P Ireland Limited) to ensure as a small local company we are prepared for a future upturn in the levels of business achievable, has been highly important to us, such assistance is available to any prospective vendor or contractor.

The applicant (Shell E & P Ireland Limited) are highly insistent on a local spending policy and to date, a dozen or more small local companies have felt the benefit of the applicants presence in the Erris region, a trend which will continue and expand during construction and production phases of the proposed project.

This is an excellent opportunity for Erris being proposed by the leading Oil & Gas company in the world, with a safety record second to none, and offering opportunities to businesses and individuals alike.

Yours Sincerely

Neil P. Rooney

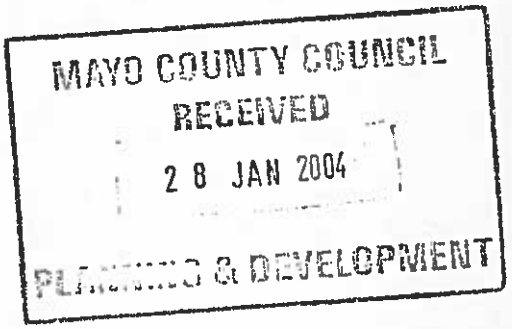
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Gortacragher
Rossport
Ballina
Co. Mayo

6438
€20 cash
28/1/04

28th January 2004



The Planning Section
Mayo County Council
The Mall
Castlebar
Co. Mayo

Re : Planning Application Ref No P03/3343 (as submitted by Shell E & P Ireland Ltd. on 17/12/03 and validated on 18/12/03) for the proposal to construct a natural gas terminal (refinery) at Ballinaboy, Bellagelly South, Co. Mayo. and to remove >450,000m3 liquid peat slurry (>650,000m3 in P01/900??) to an area of cutaway peatland at Srahmore, near Bangor Erris, Co. Mayo, by Bord na Móna Energy Group Ltd. on behalf of Shell E&P Ltd.

A Chara,

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In a letter to Teresa Mc Garry from Andy C Pyle dated 12/12/03 (copy enclosed) it states clearly in paragraph two **"Apart from the new proposal regarding peat deposition, the new application has not changed substantially from that previously considered by the relevant planning authorities".** Therefore our concerns in relation to the original proposals (P00/2934 and P01/900) still stand and we have no intention of repeating them as they are already on file in the planning office of Mayo County Council. These concerns were upheld by An Bord Pleanála's inspectors.

* An Bord Pleanála's Senior Inspector Mr Kevin Moore and Dr David Ball (an eminent hydrogeologist) recommended that the application be refused on a number of grounds including the high risk posed by the transfer of peat from one location to another and the unacceptable risk to the health and safety of the local community and the general public on the public road adjoining the site. Mr Ball conducted a report on the "Assessment of the proposed development in relation to soils, peat, bedrock, groundwater and surface water and their influence on other planning issues under consideration". The board of An Bord Pleanála unanimously refused the proposed application with direct reference to the issue of peat removal. An Bord Pleanála's register reference is PL 16 126073.

* Mayo County Council have refused planning permissions for developments incorporating septic tanks in close proximity to Carrowmore Lake due to poor soakage and thus a risk of pollution. In relation to proposal P01/900 Mr Kevin Moore stated in his report that "It is a policy of the planning authority (i.e. Mayo County Council) as set out in the current Mayo County Development Plan to protect the Carrowmore Lake area of outstanding natural beauty, designated an area of special scenic importance . . . The proposed development would seriously injure the amenities of the area, would conflict with the policy of the planning authority and would contravene materially the objectives of the current Mayo County Development Plan. The development would

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therefore, be contrary to the proper planning and development of the area". The proposed Srahmore peat deposition site is located downstream from Carrowmore Lake and is composed of cutaway bog. Bord na Móna Energy Ltd intend to deposit peat slurry on this site into a large basin-shaped depression. The Owenmore and Munhin rivers drain from the Srahmore site into Tullaghan Bay. The Munhin river also enters Carrowmore Lake. Concerns arise with respect to potential siltation of these watercourses. The Munhin is a key salmonoid river (Annex II of the E.U. Habitats Directive). Resulting siltation of Munhin river and Carrowmore Lake will have a detrimental effect on the salmonoid and other species resulting in blocked gills, clogging of spawning beds etc. Siltation will also effect the drinking quality of the resultant drinking water for consumers during the treatment process as Carrowmore Lake provides domestic water for most of the Erris area. The increased probability of silting to Tullaghan Bay must also be considered.

* There will be elevated dust emissions due to haulage vehicles and onsite vehicles generating exhaust fumes to the localised environment. With reference to the previous application Mayo County Council in their schedule of conditions insisted that the road between Ballinaboy and Bangor (L1204) was not to be used by heavy vehicles. This road is sandwiched between Carrowmore Lake (cSAC - Natura 2000) and Sliabh Fyagh (cSAC), both protected areas under European legislation. In the proposer's amended traffic plan the proposed volume of traffic and the additional volumes of material for transportation to and from the site along this road poses a real threat to these fragile ecosystems and the possibility of further landslides occuring (see below).

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* There will be elevated noise levels generated by this activity.

* There will be elevated releases of carbon during peat slurry removal from Ballinaboy to Srahmore. Also phosphates and nitrates due to removal of planted conifer forestry (Coillte owned land). This will have highly negative impacts in relation to eutrophication if allowed to be washed into local water courses. Silting also leads to eutrophication.

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* There is also a potential for flash flooding where unstable peat slurry has been spread out over a wide area of cutaway bog at Srahmore.

* The method of peat deposition proposed will have adverse impacts on groundwater as the supersaturated, contaminated peat is to be spread out in a depression and its surrounds. The resulting discharge will seep down more readily into the groundwater sources with the potential to alter the existant water table and ground water systems.

* Within the peat slurry itself there will be an elevated probability of suspended solids and turbidity release due to the mixing of the peat. The high levels of rainfall in this area will accelerate this and the peat will increase in bulk.

* A baseline study of flowrates in the Srahmore area would need to be conducted over a period of a least two years to gain a better assessment of drain loadings, rainfall etc.

* We must also consider seriously the effect of flash flooding bearing in mind the multitude of landslides which occurred on the 19th September 03 in Dooncarton, Glengad, two miles from Ballinaboy, where flooding also occurred as a result. 89.3mm of rainfall was recorded in Dooncarton

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on that day. During the proposed process of removing liquid peat from the Ballinaboy site there is a strong possibility of leaching to local watercourses such as Lenamore river, Glenamoy river (salmonoid rivers) and Sruhawaddacon Bay (SPA and cSAC).

* The removal and deposition of saturated peat and other elements to an area of cutaway saturated peat will distort the underside and the surrounding peat structure. This will lead to a sink which could lead to a bog burst and potential pollutants effecting local catchments. The Derrybrien event in County Galway is one such example of a bog burst.

* Loose peat slurry will be very prone to erosion. Elevated rainfall would erode the peat surface further and thus increased runoff would occur.

* Have Shell E & P Ltd. and Bord na Móna Energy Ltd submitted any referenced documentation that attempts to describe the successful deposition of supersaturated peat on underlying cutaway peat. Have the relevant authorities considered the real risk to human health with respect to contaminated buried carcasses on the Ballinaboy site, an issue which was raised at the oral hearing into the proposed gas terminal (refinery) at Ballinaboy and which is referred to in the Terminal EIS Volume 1, 8.4.6. The quantities of peat in this case and the proposals for the removal and deposition of same are unprecedented. Securing for infinity a minimum of >450,000m3 of peat slurry and miscellaneous in an area of high rainfall under these circumstances is a concept. A failure at any level would constitute a serious health and safety hazard. Bord na Móna have a very poor environmental track record locally and nationally in relation to the control of silt and the protection of water courses.

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* The Board of An Board Pleanála in their summing up of the findings stated "Finally, the Board noted that alternatives are available for the development of the Corrib Gas Field". This was backed up by Inspector Moore in his report under the heading 2.0 Alternatives where the board were unsatisfied with the information provided by the proposer despite specifically being requested to address an alternative option. There has been no feasibility study produced to date on the offshore option or on alternative sites. The technology is available to recover and process natural gas and oil at greater depths and harsher sea conditions than those found in the Corrib Field and is already employed by Statoil and other companies in Norwegian waters. This has been the international standard for a substantial number of years.

We trust that Mayo County Council will take our genuine concerns on board with respect to this proposed project. Our experience with the planning section of M.C.C. to date has been one of inconsistencies in providing accurate information and it is a source of regret to us that this still appears to be the case as appendix A (attached herewith) will demonstrate.

Yours sincerely

Bríd Mc Garry.
Bríd Mc Garry,

Teresa Mc Garry
Teresa Mc Garry

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Shell Exploration & Production

Ap/Sm

Shell E&P Ireland Limited
Corrib House
52 Lower Leeson Street
Dublin 2
Ireland
Tel +353 1 669 4100
Fax +353 1 669 4101

Ms Teresa McGarry
Gorthacragher
Rossport
Ballina
Co. Mayo

12 December 2003

Dear Ms McGarry

Subject: Corrib Natural Gas Project

I am writing to confirm that we have reached the decision to submit a new planning application for an onshore gas terminal at the Bellanaboy Bridge site. This intention will be advertised in the Irish Independent on Saturday, 13th December and the application will be lodged before the end of December.

The new application will incorporate the proposal for the removal of peat from the proposed site and deposition at the Bord na Móna cut-over peatland at Srahmore. This new proposal was well received during extensive consultations and at the recent exhibitions. Apart from the new proposal regarding peat deposition, the new application has not changed substantially from that previously considered by the relevant planning authorities.

We understand that the planning application, once submitted, will be available for members of the public to view at the Mayo County Council offices in Castlebar and the local council office in Belmullet. The local authority has also advised us that nine days will be added to the statutory period to compensate for time lost over the Christmas and New Year holiday season.

An Environmental Impact Statement (EIS) to accompany the planning application has been prepared and, under the Planning and Development Act 2000, the local authority is responsible for addressing requests for copies. Copies of the non-technical summary of the EIS will be available on our website www.shellireland.com once the application has been lodged.

May I take this opportunity to thank you for your support throughout 2003 and to wish you a very Happy Christmas and a Peaceful New Year.

Yours sincerely

Andy C Pyle
Managing Director

03/3343

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Registered Office
Corrib House
52 Lower Leeson Street
Dublin 2, Ireland
Registered in Ireland
Number 316588
VAT Number IE 6316588 P

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Appendis A

Our experience with the planning section of M.C.C. to date has been one of inconsistencies in providing accurate information to us in our evaluation of this proposed project P03/3343.

Planning Application Ref No P03/3343 was submitted by Shell E & P Ireland Ltd.to Mayo County Council between 2.30 p.m. and 3.00 p.m. on 17/12/03 and validated on 18/12/03 between 5.30 p.m. and 6.00 p.m. (after regular office hours). This was verified in a telephone conversation I had with Mr. Ian Douglas, Chief Planner on the 19/12/03 in which I requested a letter stating the above details. I was informed that it would be attached to a box of EISs which I had ordered on the 19/12/03 for collection on the 22/12/03 at a cost of 100 euro.

On the 22/12/03 I collected the box of EISs and again spoke to Mr Ian Douglas. However the letter I requested was not attached to the box as agreed. Mr Douglas then informed me he would forward the requested details to me by post after Christmas and needless to say I have not received this information.

On 22/12/03 I also made enquiries about the cd rom equivalent of the EISs and was informed that one cd rom was available to the public which covered all of the information in the EIS volumes. This was not available for purchase at the time I called to the office (12.30 p.m.). Mayo County Council closed their offices on the 23/12/03. I enclose the following extracts from the Mayo News written by Liamy Mc Nally (DE FACTO) dated 07/01/04, 14/01/04 and 21/01/04 which illustrates the incompetency of Mayo County Council officials in this matter. It emerged that there were in fact four cd roms.

Signed by: Brid McGarry.

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DE FACTO columns by Liamy MacNally.

THE INCOMPLETE EIS

AN EIS must be completed with the planning application. That is the law. Copies of the EIS should be made available for purchase by the public. That is also the law. The complete EIS for this application was not submitted with the original planning application. An official in Mayo County Council planning department notified me last Tuesday (December 30th) that further information regarding the EIS had been received. The planning application was made on December 17th. Copies of the EIS were not available to all people who wished to purchase a copy after December 17th – not Shell's fault or Mayo County Council. Shell had submitted the required number with the planning application. It is just a quirk of the Irish legal system. The law states that such copies must be made obtainable "as soon as may be available." How is that for legalese?

It puts Mayo County Council planning officials in a difficult position. Should the 5-week window for observation/objection begin from the date all the information was submitted? This was a request of the Friends of the Irish Environment, after one of their members was unable to buy a copy of the EIS. If information was outstanding why did Mayo County Council validate the planning application? Can the application be validated when all the information was not to hand on the day of validation? All the parties involved are big enough, brave enough and have adequate supports, both financially and otherwise, to ensure that every 'i' is dotted and every 't' crossed.

Mayo News 07\01\04

Corrib Gas Project Revisited

FOLLOWING last week's column, the Managing Director of Shell E&P Ireland Ltd, Mr Andy Pyle, wrote: "In an article written by Liamy McNally in the paper on Corrib under the heading "Incomplete EIS" it is stated that "The complete EIS was not submitted with the original Planning Application". This purported statement of fact is totally and completely untrue and has the potential to mislead the public and also to undermine our planning application in the eyes of the public. I would ask that this be corrected at the earliest stage by the newspaper.

Reply: Andy Pyle is correct. The complete EIS was submitted with the original planning application to Mayo County Council. That submission was made on hard copy (folders and maps) and is the submission used for validating the application, which was done by Mayo County Council. The incomplete EIS mentioned in the article should have referred to the CD copy of the EIS which is made available to the public. Public consultation is an integral part of the planning process and it is up to the applicant to ensure that complete information is made available to the public. This copy was incomplete, as verified by a senior council planning official on December 30th last. This does not in any way invalidate the Shell application and I am happy to clarify the matter on record.

Mayo News 14\01\04

THE CORRIB GAS PROJECT

THERE is also more confusion on Mayo County Council's handling of the Shell Corrib Gas project. The following is the timetable of the availability of the CD version of the EIS to me, as a member of the public:

Dec 17th: Planning application and EIS submitted by Shell to Mayo County Council.

Dec 19th: CD copy of EIS requested from Mayo Co Co – not available.

Dec 22nd: Still not available, despite assurances on Dec 19th.

Dec 23rd: Contacted by Mayo Co Co to say EIS CD available. Offered one CD and informed that all information was contained thereon. Asked the official to check – on his return he said there was another CD, which was handed over. The fee of €20 was paid to Mayo Co Co. About ten minutes later I received a call from Mayo Co Co - there were another two CDs that also form part of the EIS. Returned to collect same.

Dec 30th: Informed by Mayo Co Co that they had been advised by Shell that the CDs did not contain all the relevant information. Another CD issued.

Jan 16th: Received a registered letter from Mayo Co Co with another CD and the details as follows.

"The applicant has brought to our attention that a number of files were inadvertently omitted from the digital version of the EIS given to Mayo County Council on CD and copied to you. The missing files, contained in the enclosed CD and labelled to match the folders contained in your earlier CDs are as follows:

There is a Chapter 5 contained on the CD however it is an old draft of this chapter. This new file which contains the most recent census data is the version of chapter 5 contained in the hard-copy of the EIS.

Additional Note: Waste licence application drawing WLA_300 series.pdf and WLA_series.pdf were sent to you on disk in error – these do not form part of the planning application or EIS. To ensure that any submission you may wish to make in relation to the missing files can be considered, you should make a submission based on the information contained in the original discs before 30th January 2004 in the normal way. Submissions on the missing files up and including (sic) 19th February 2004 will be considered by Mayo County Council as supplementary to your first submission. This is to ensure that the Council can give consideration to your full submission…

Confused? In short, the time for submissions on (some of) the EIS has been extended. Some people have been waiting since December 19th for CD copies of the EIS. Can any Mayo County Council official explain why? Can this disrespect for the rights of the public be classed 'Government Policy'?

Mayo News 21\01\04

03/3343

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TO :-the Planning Dept., Mayo Co. Co. File No. P03-3343

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€20cash
28/1/'04

Enclosures.

1 copy of submission. (12 pages)
Appendix I.
Appendix II
Floppy Disc - being extract from Farmer's Journal.

Delivered by:- Brid Mc Garry

Date:- 28\01\04.
Time:- 3.15 pm

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Submission to Mayo Co. Co. relating to Planning Application File No. P03-3343 by Shell E & P Ireland Ltd., being the construction of a natural gas refinery at Ballinaboy,the establishment of a dump on cutaway bog at Srahmore on foot of the waste generated by this construction, the transport of enormous volumes of waste products between the two named sites.

Submission: Micheál Ó Seighin, Ceathrú Thaidhg, Co. Mhaigh Eo, and others.
Contact: Micheál Ó Seighin
Contact Phone: 097/88961
Contact Ríomhphost:- moseighin@eircom.net

Réamhfhocal:- A seanfhocal from Erris says "*Thit an spéir ar Acaill, agus cuireadh tincéirí iarainn ann dá deasú.*" Wrong analysis, wrong problem identified, wrong solution, in short, wrong.

Context:- This is the third full application for planning permission for this project by the promoters, quite apart from responses to the authorities requests for "further information". The first application, frighteningly deficient, was not proceeded with, and the second full application (P01-900) was granted by Mayo Co. Co. officials and, on appeal, refused by An Bord Pleanála.

It is important to note that in the EIS and accessory documentation, accompanying the present application, two elements of discourse predominate, and are repeated ad nauseum: 1. The project was refused by An Bord Pleanála only on the single grounds of the unsafe storage of peat, or peat slurry. 2. This project is strategically important for Ireland's national interest.

The discourse thus presented does not take into consideration the following facts :- (a) An Bord Pleanála accepted that the project even as presented then(lower than now) would be visually obtrusive but over-ruled that on the grounds of major importance; (b) An Bord Pleanála accepted that alternative sites are/were available; (c) As the Health and Safety Authority is the nominated body for occupational health and safety matters the Bord accepted the report, prepared by the HSA based on information supplied by the applicant, on the direction of the Bord, on the occupational safety of the plant. The recent (January 2004) blast that destroyed a gas terminal in Algeria, killing ca. 30 and injuring ca. 70 is not likely to give the HSA second thoughts, but it should. **Neither the HSA nor the Bord nor Mayo Co.Co. has any authority to consider the health issues at the centre of the community's concerns, i.e. the issues relating to emissions, to air, riparian systems and sea,** nor did they do so. Also, Mr. Colreavy, representing, with his legal advisers, the HSA at the oral hearing into the appeal of the grant of planning permission, stated, in response to a direct question, that neither he nor any member of the HSA would accept responsibility for any damage or harm, if such should occur as a result of his recommendations in this matter.Comforting.

This matter of "responsibility" has taken on a new aspect since the last hearing of this request to build the terminal at Ballinaboy and its corresponding inconveniences. A natural result of the acceptance of "benchmarking" as the norm is the requirement of transparency from all decision makers, so that our public service can no longer hide behind abstractions like "Mayo County Council" or "Health and Safety Authority" in making and publicising decisions, so that those who make decisions in our public service shall be as responsible as Sir Philip Watts is held responsible for decisions taken in the name of Shell. The day of "Yes, Minister" as a reality, has been condemned to death by social partnership. Mayo Co. Co. does not make any decisions - defined people do; (d) The strategic importance of this project for Ireland is as proven as the nuclear arsenal of Iraq,

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and equally polemicised. The long list of key words used, repeatedly, formulaicly, to "prove" this dependence - indigenous, end of gasline, security of supply, independent source of gas, etc. - does not at all prove the hypothesis, here presented as fact. Appendix 1 to this submission, (the exploration case as seen by the oil industry) shows clearly the impossibility of this project being in any way a contribution to Ireland's strategic balance, whatever the wording used. But, of course, with enough gas, any balloon will fly. Bord Gáis publications for 2002, the Taoiseach's euphoria in the Dáil about exports of gas, the knowledge that, although Marathon pays the State around £10,000,000 a year levy on Kinsale gas production, the State immediately returns the money to them entirely, but in a Dept. of Finance cheque and much else besides, a growing awareness of the reality of the Exploration and Leasing Acts of 1992 and the Finance Act of the same year, the ongoing saga of Telecom, all reinforce an accelerating cynicism regarding what our elites see as "the national interest". After all, the tribunals are about implementing national housing policy?

It is necessary, for the benefit of those who come after us, and will try to understand issues, to show clearly why we oppose this project while other interests are gasping for it. We oppose it because we are worried for the health of those who come after us in sequent occupance of this area; because we believe the project cannot be delivered without enormous damage to the area and to the long term financial health of the people who now and through generations past have maintained a human presence in this testing environment and because there are alternatives. It is necessary that a clear paper trail be laid down so that it can be seen, in a genuflection to the late John Healy, that someone, some people shouted stop.

There are supporters of this project, but they generally live some distance away:- In a recent local radio interview, the parish priest of Bangor, Fr. Brian Conlon, welcomed the gas(sic), one presumes on behalf of his parishioners, and in possession of the inside track in these matters. It reminds one of the efforts of his predecessor in that exalted position, Fr. Gilvarry, who in the early 1970ies (according to the national archives)appealed with great passion for a nuclear power station in Erris, on behalf of Bangor Development.

The Ballina Comhairle Ceantair of Fianna Fáil also sought the same privilege for Erris (according to the national archives). Frank Fahy supports the project. Eamonn Ó Cuív and the entire political firmament of the major political parties and their local acolytes. The local support group based on Bord na Móna management and staff supports it. Almost anyone with something to sell supports it, whether it be a house to rent or a lorry of stones. The judgement of Fr. Gilvarry in the sixties and his prophetic example are not encouraging.

The final aspect of context we need to carefully consider is the matter of the hill at Dún Chiortáin, overlooking a Kilometre of pipeline on land and considerably longer at sea. The developer is quoted as saying that it was notified by Mayo Co. Co., previous to its first submission for planning, of the hill's history of landslides and of its geological instability. Mayo Co. Co had, at that stage, given permission for the construction of the aviation tower on top of the same hill. Subsequently Mayo Co. Council authorised the developer to blast under the hill and for an unspecific distance out to sea, just under the same hill. That Mayo Co. Co.'s regular consultants, Tobins, (are they the same engineers who did the roads' job for Shell on the L1204?) now finds the hill not to be geologically unstable, is hardly comforting: the hill and its residents was washed out in the meantime. The developer in this application says that blasting will not be required at Ballinaboy: it was essential when the last and previous application was submitted. One presumes that the blasting at Dún Ciortáin etc., already licensed, is still on?(Appendix II)

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Having mentioned some of the considerations vital to an understanding of the context of this project, we, the undersigned, will now comment on some of the issues presented in the EIS accompanying the application for planning permission. Our comments are not intended to be exhaustive: a more complete examination is the duty of the planning authority, its resident staff and its independent consultants, on the basis that it is the staff and members of the local authority and not us on whom the project impinges, who bear and will continue for the duration of the project to bear responsibility for the results of such decision.

Non-technical Summary -Ballinaboy.

There is no such thing as "security of supply" of hydrocarbons, under the Irish exploration and lease terms, except in so far as a commercial deal between a business operating in Ireland and any gas supplier anywhere is legally binding. The only obligation on a company sourcing gas under Ireland's land or its territorial waters is that payment must be made to some entity that has an address in Ireland: and this applies only to ensure that all the benefits of the Irish tax regime accrue to the relevant lease holder. There is no obligation on Shell, Marathon or Statoil to supply the Irish market under any circumstances, emergency or otherwise. However, the Corrib field does re-inforce Norway's security of supply, as Statoil are governed by Norway's strategic needs. An Taoiseach is recorded recently as saying in the Dáil that the supply of gas available to Ireland from Eurasian sources is almost limitless. There is no point in our wasting our time in pointing out the obvious. The facts are simple and available if the planners wish to see them: but thit an spéir ar Acaill.

Electricity *"subject to occasional supply interruption"*:- unlike the U.S.A. or London???.

We import gas "*from the U.K." :* or/and "through the U.K." And the Taoiseach hopes shortly to be exporting it to the U.K.

Gas pipeline to the West or from the West is a political decision if it is not economic for An Bord Gáis to do so, and so in breach of their terms of reference. (Does Bord na Móna labour under this disadvantage?.) There is no sign of the political will necessary to enable the West and Border Regions even under the application of the Spatial Strategy.

Has Mayo Co. Co. and its advisers available to it the literature on the different technologies here proposed, relating to the re-enforcement of the peat with cement or such, and the use of sheet piles, dumping of masses of peat slurry. All the information available to us suggests that the behaviour of sheet piles in peat is largely unknown and unresearched, has not been at all adequately studied and piloted and that its use in this context is experimental and untried. We do not believe this to be adequate tested technology for a project of such serious environmental implication as this. Where is the literature?

"*reduce the cost of fibre optic infrastructure"* and of soda water fountains on top of candy mountain.

"best solution" for the developer : no one expects the developer to look for less than the for it optimal return. Evidence given by experts for the developer at the oral hearing into previous planning application for this project showed clearly that financial considerations - not economic - were decisive and over-ruled everything else.

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p. VIII "*Floating production concepts are untried solutions.....Atlantic region.*"
The developer is not shy when it comes to "untried": sheet piling in deep peat, transport decisions, 8 Km high pressure pipeline from foreshore to terminal, etc. It might occur to one to point out that there are no tried solutions for gas production in the specific area cited.

"*The length of the subsea pipeline became a technical constraint on the site selection*" the word "constraint" is carefully chosen, for at the oral hearing previously referred to it was admitted by the technical experts of the developer that there were no technical problems relating to distance that would be decisive. Financial considerations were/are paramount.

Purpose of Terminal: addition of Mercaptan is not included - it has a history. Also excluded "remove some pollutants up to a chosen standard."

"*small volumes of condensate*" - *small? "condensate will be used as fuel in the terminal*"...not natural gas?; XVII "*natural gas been chosen to fuel the electricity generators*" not condensate?

"*will effectively lower the terminal footprint by up to 10 metres*" lower from what? 'Tis proposed to be higher than the last application?

"*to prevent any pollution*" ..impossible.

There are bats between Ballinaboy and Bangor: there are hen harriers on the Ballinaboy site. No mention of cetaceans. Shell is aware of the extent of dolphin colonisation of Broadhaven Bay.
Marine Impacts:- recent questions re. toxic pollutants in esp. farmed salmon must question optimism of polluters in shallow waters.

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No promises are bonded, i.e. they are as so adequately described by An Taoiseach in a response to Deputy Kenny of Fine Gael in the Dáil effectively saying "the deputies' objective is to stay in the Dáil and they'll claim anything to arrange that."(not a verbatim quotation.): "say" "promise" is as useful as An Taoiseach obviously believes. Bond it!

Sustainable Development:- "*Development that meets the needs of the present without compromising the ability of future generations to meet their own needs.*"I do not accept this Shell definition as in any way adequate: it is terminally misleading. There is no spatial context - in a vacuum anything goes or does not go. 1. "present" does not have needs - people have. Any particular standard demanded requires a corresponding level of needs satisfied. 2. the needs of future generations of people will be dictated by or based on the mess or otherwise, at any rate the legacy we leave to them.
Apply this definition of sustainable development to Irish housing requirement, from whatever perspective you come, and the emptiness of the verbiage is obvious and scary to think that this definition is actually the yard stick for some major developments.

"*limiting emissions of various gases*"..from a basis of nil, how do you limit?
The last sentence of the non-technical summary, vol 1 re-written says "anything is better than no change at all": in that culture tá an spéir titithe ar Acaill.

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Non-technical Summary Vol 2. Srahmore.

Initial Comment:- The proposal intends to turn the area from Glengad to Srathmore, some 20 Kms into a building site, in the sense that the normal experience of an extended building site will be suffered by the population. The scale of this proposal, when alternatives are available, is mind boggling, and is playing Russian roulette with the area. In the EIS as provided it is very difficult to appreciate where Shell ends and Bord na Móna begins, except that Bord na Móna, i.e. the tax payer, carries the can into the future. The general picture is that Shell turns X Hectares of peat into Y tons of waste, which is to be transferred off site to an unlicensed undesignated dump, and Shell/Bord na Móna seeks planning permission for the activities necessary to create this waste, this transport issue and this dump. The waste is to be transported as 11 ton loads, in a mix of 9 (or is it 10?) tons of water to one ton of solid(or is it two?). As the matter of the dump at Srahmore is a matter for the local inhabitants and the owners of riparian systems likely to be affected we keep comments to a minimum, but it is necessary to point out that the re-designation of Srahmore as an official dump does have an effect on the issue of Ballinaboy terminal.

Summary:- The EPA is quoted as stating that waste is *"any substance or object belonging to a catagory of waste"*. Now we know.

p. 2. *"recolonise by natural species"* I fail to find the literature on what is the experience of the dumping of this volume of peat dumped on a cutaway semi-compressed bog and what is the state of this waste and when modelled; methodologies to ensure that objectives, whatever they are, are achieved?The creation of a mire on vacuum processed bog, and its restoration takes generations.

p.5. *"provided the mitigation measures are effectively implemented."* Presuming that Bord na Móna are taking responsibility we must point out that the history of Bord na Móna practice is not encouraging:- 1. For over 20 years Bord na Móna had to deliver potable water to the local residents because silting from Bord na Móna processes had completely polluted the traditional supply. The water carrying only ended when the Carramore regional water scheme came on stream.

2. An effort by Bord na Móna to build a filtration bed to make the water usable failed because of silting.

3. In the "Farmer's Journal", August 2nd., 2003 the devastation wrought by silting believed to be from the Blackwater Works of Bord na Móna in the rivers Brosna and Shannon areas of Offaly is given a middle page spread. The EPA has said that the area suffers from "heavy siltation". The story is followed up in the Journal of December 27th. (see enclosed floppy disc.) 4. "The Examiner", 29/7/1999 describes a report by the IFA that blames Bord na Móna for pollution on the River Barrow. IFA President, Tom Parlon is reported as saying the damage done to farmland along the river includes spoil banks up to ten metres high.

5. RTE News, 3/1/2004 (RTE Interactive): Records that a report by the Lough Ree Lough Derg Catchment Monitoring Group shows that Lough Ree is 40% polluted by *"industry, local authority sewerage, and Bord na Móna."*

6. We fail to find an instance where Bord na Móna gave unsolicited disclosure of pollution caused in whole or in part by Bord na Móna operations.

We fail to find literature on "Haku trucks". However the **Haku system** of drying and storing **milled peat** is of course the system preferred by Bord na Móna and some other operators. Trucks are built of course that suit the Haku system.

p.6. re-wetting: we cannot find the literature on the re-wetting of this scale of loose material on semi-compacted well-drained cut-over bog and consequent re-colonisation. What is the success etc on re-instating a *"peatland eco-system"*? In the extensive literature listed in Bord na Móna lists there is nothing to remotely resemble this optimistic multi-faceted scenario, especially when one keeps in mind that Bord na Móna best practice and normal practice and, to our knowledge only practice, is to

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drain a bog for 8 years before daring to remove the first 2 inches. Restoring vegetation and carbon dynamics in a cutaway peatland, we are led to believe, cannot be quantified, in the present state of knowledge.(University of Helsinki, Helsinki 2000: Eeva-Stiina Tuittila). And be stable in 5 years?
"The area could be incorporated into the existing network of eSAC & pNHAs." As what?
p.8. "peat on peat" implies like on like - it is not: there is an interface that must form a watertable.
p.9. Munhin River is only exit from Carrowmore Lake and only entrance from the sea: *"slightly polluted" ?; "suspended solids"? "effective drainage of peat mounds"* what is proposed is not milled peat, less that 4 cm of which is removed each year, which has been heavily drained for 8 years before any work undertaken, which means that 18 years drainage has occurred by the time 1 metre of bog has been removed at the rate of 2" per year. This created waste has a consistency closely resembling Bailey's, or curds in a soup of whey. What justifies suggesting that experience of milled peat is relevant to the proposed one? This peat is not nice harvested sods, boys and girls: 'tis slurry handled 10 times or more, taken from a mire state.
p.11*"dust may be generated"* - must be generated: historical efforts by Bord na Móna to control dust have failed, and these are best practice. Milled peat floats - in air and on water = silting: simple.
p.14. "requirement to minimise releases" is just a requirement and is only as useful as its application. Does the history of Bord na Móna suggest the requirement will be realised?
"indigenous" confers no advantage when asset and its benefits have been given away.
p.16. What has been agreed with Mayo Co. Co re roads: if the local authority has already made up its mind so openly, then what is the point of a planning process? Why the strange U-turn by Mayo Co. Co.? In previous applications Mayo Co. Co. insisted that no heavy vehicles would be allowed from Bangor to Ballinaboy on the L1204 : now all changed utterly. Not alone can the heavy trucks bringing the materials and machinery for the structure at Ballinaboy now travel this road and workers' cars, but also 36,500 tons of dry cement, and 17,500 tons of ready-mix, and 450,000 tons of peat, and 33,000 tons of mineral soil, and 78,000 tons of fill, and Bord Gáis pipes and construction materials, and 21 Km of waste pipe, and some miles of X pipes and the umbilical and and and. And how long is it since the bridge at Glencullin collapsed from a minor (as we know now) bog-slide? And this through the full length of the Carrowmore Lake SAC? Are ye right in the head? Has the change come about since the discovery of the desperate state of the bridges and bog roads through Glencastle, or is it the response to Shell playing hardball (as they are perfectly entitled to do, whatever their present difficulties.)? We are aware of some whoppers of inconsistency in planning decisions - a decision in early 1997 gave full permission to a bungalow in a highly obstructive place between road and sea less than a fortnight after the application was lodged and contained other wonders - but this total turn around of a strictly engineering decision requires explanation. And remembering that Mayo CO. CO. is an abstraction that does not make decisions.
p.17Cumulative Effect:- *"may increase or decrease impacts"*..quite.
p.18. Terminal and Srahmore do not comprise a project: they are only half a project, and as such consist of project splitting, which, to the best of our knowledge, is against regulations, both national and European.
Switch from oil to gas... but condensate, i.e. oil, used by Shell in Ballinaboy?
"NOx and SOx emissions limited" but ye are producing them - how is that limiting them?
"increased focus on waste prevention and minimisation" But ye are creating the waste - turning a material asset, peat, into a mass waste product?
"replacement waste habitat" models? examples? success? literature?
"ensure security of gas supply" how? The only obligation on the three companies that now own and control the supply is to their corporate shareholders and, in the case of Statoil, to the Norwegian Government.
"provide balanced regional development" Say it again, Sam: you may wake up and find its true!

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p.19: E.M.S.:- "*use of natural resources*" = turning peat into waste: turning cutaway bog into a permanent dump: using two major fishing rivers as a silt trap? Is the thrashing of a material asset sustainable development according to Bord na Móna/Shell?
"Continuous environmental improvement programmes" What are they/where are the models/ have they worked/?

Finally:- The scheme or concept proposed here is crazy and is the triumph of optimism over intelligence and experience and proper practice. Bord na Móna has always used the language of best practice: it is a matter for the planners to investigate and come to a decision if the practice of Bord na Móna on the ground corresponds with the discourse, and let it be known on what real basis such a decision is based on. On a practical level one notices the following: the implementation of any monitoring etc of displaced peat slurry and the removal of same from Ballinaboy would of necessity be done by the present staff and management of Bord na Móna in the area, some of whom have a conflict of interest, as defined by Bord na Móna Code of Conduct, in that, in their private capacity as business people and property owners, they provide services and support for the promoter of this project: Neither Bord na Móna nor Shell have deemed it necessary to deal with this most disastrous of p.r., "*the existence of the interest*" which no doubt has been disclosed to Bord na Móna higher management, but which also needs to be given the transparency the importance of this subject demands. A pig in a poke is unacceptable even under 30 year disclosure rule.

Tourism:-*"There is a general shortage of accommodation in Mayo, which is partly due to the unsuitability of the land for building, as it is mountainous, boggy, sandy and liable to flood".*
and there be monsters.

Windrowing:- In a hole in the ground in an area said by the developers to be heavily shaded by trees, the mainstay of the "not visually intrusive" argument? What wind? This is the equivalent of the same set of consultants saying a structure is unstable and then again stable: great if you can afford one, but not credible re. a vital indispensible part of proposed methodology

Dry season, wet season:- One notes that the "once in a 100 years downpour" that swept Glengad Hill and surrounds, took place in Sept 2003, not in the proposed "wet" season. Also, of course, Derrybrien did not need any rainfall to move - just minor construction activity.

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10.4.4.Implies that the developer already knows the IPPC licence requirements even before licence is applied for? Possible?
11.3.2.Why not eliminate the "*potential for mercury emissions*" instead of just "*minimising*" them?
11.5.1. The prevailing wind blows emissions directly onto the houses in Bun Abhna and on up the Glenamoy floodplain. The strongest winds, however, blow towards Carrowmore Lake. In this respect, the Wind Rose as used is deceptive unless used for what it is supposed to be used. The basin shape of the area does hinder dispersion but not if you live somewhere else.
11.What is the generating capacity of the plant to be installed at Ballinaboy? Does it merit the designation of power station? Is a specific licence required? At what level does a power plant require a specific designation and licence? (Check Alcan).
11.13.2 Belmullet is not a "*representative met station.*"
11.17: The proposed site **is** in a basin - on a marble in a basin. The infrequency of inversions in Belmullet is comforting, and makes it more acceptable to choke on NOxs etc in Ballinaboy and Bun Abhna as long as Belmullet is happy. Simeon would understand.
12. Only a "*relatively small no* "of people will suffer, so that's fine.
14.9 i.e. 50,000 tons of CO2 - originally nearer 70,000. And the methane of 26,000 cows.
14.7.2 The reduction in oil usage here implied is totally false: primary maths sufficient.
16. Traffic: Only the local authority can explain the u-turns here involved - I mean the local authority concrete engineers who made the decision not the abstract Local Authority.
18.2.1"*The Corrib has four distinct elements*" Only two are subject of this application = project splitting.
18.2.2 No mention of the monarcain chaca at Muing Mhór?.
18.6 Only pipelines or tankers of LNG make gas more widely available, not a new supply from Sakhalin or the Duiske field: gas moves along pipelines = our insight/inspiration!.
19. Senseless propaganda - say it again Sam often enough and it may be true.
Table 19.2 Comparison should be with greenfield site, if useful information was the criterion.
No bonding of decommissioning - British Authorities have more backbone and sense of the national interest.

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Vol 1. Technical Appendix 2.

4.6. The issue of strengthening the peat begs many questions.
5.1 A reference to the Channel Tunnel experience of, I think, Arup, is the only traceable reference for this proposal? Is nothing else available?. The reference would be better if it was detailed.

EIS. Vol 2. Srahmore.

p.5 "*If all mitigation measures are applied*" this mantra is repeated ad nauseum : it is the Rosary of this project and the most important discourse. Have similar measures been applied previously and have they worked? All processes must be set off against this standard - have they been tried - have they worked.
2.4 Haku system deals with milled peat.
Fig. 2.5Waste material to be compacted by bulldozers? What does research say will be the result of this - certainly not puff pastry?
2.4.2"*will be effectively treated*" has it worked up 'til now? (hiwun).
2.5 Initial 5,000 cubic metres to be "*extensively drained*" How? Precedent? Have spreading methods "*examined*" been implemented before? If so, where/when/result?
5.3.8.Tourist Survey finds "*too much development...and improved roads*" as the problem?
6.3 "*Depositing area*" is Tullahaun Bay.
Mixing of peat: destruction of natural stratification: paper trail, please.
7.3.1 Designated Areas - how designated must one be?

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Low variety of species present in Munhin River and, in the case of Tullahaun Bay, much lower than in the rest of Blacksod Bay - ascribed by NPW staff to silt accumulation from Bord na Móna working - obvious from visual. Where tidal flushing is active, pollution not so dominant.
The County Secretary, Mr. Condon has first hand knowledge of the effect of silting from commercial peat works in the Dubh Loch area, just south of Cill tSéana. We notice (Irish Times, 23/9/'03) also that Mr. Condon is in a learning mode: vis a vis Glengad collapse "*It's certainly been proved that peat can move.*" Mr Condon, in the same interview, said that if the peat excavated from the terminal site was to be taken away, rather than stored "*it wouldn't be a problem*". He seems, in the same interview, to be quite happy that whatever peat was removed to make way for the runway at Barr na Cúige has disappeared: tho' he doesn't know what happened to it. The foregoing illustrates two points:- 1. The County Secretary is quite happy to sign off on this project, whatever it is; 2. He wishes another miracle would happen, like the Knock one, and that the peat would disappear.
No spawning or nursery areas where peat silt has access.
7.3.2 Extract from EPA (2,000) shows clearly ongoing polluting effect of B na M works.
9.8 *"The infrastructure will be capable of catering for all rainfall events above the design rainfall".* O Lord but 'tis nice to be humble and blessed with such foresight: the Shannon and Brosna and Loch Ree show how effective this direct contact with God has been.
9.9 How can a "*sampling programme*" "***ensure*** *that all discharges from the site are within permitted discharge limits."? "regular sampling"* means nothing except that samples will be taken regularly (if the entire process is carried through.). Lost performative.
16.4.2 How do Mulranny and Maam Cross end up "*in the vicinity of the proposed development*"?
19. The EMS draft is lovely, and as useful only as its implementation for now and forever until the mixed up peat re-layers and stabilises: and the taxpayer, directly or indirectly, whoever whatever whenever however pays the piper.

The proposed dump site at Srahmore goes as far as the Gaoth Sáile road: once a dumping licence is issued, that is that, but it is a matter for the people of that part of Erris. Our concern is with the entire project, and the Srahmore is merely an extension of it, the effect of which is that now over 600 acres is being despoiled to facilitate a footprint of 30 acres: never has so much been despoiled by so few for so little.

As this proposal is to a large extent the equivalent of the previous application refused by An Bord Pleanála, it is essential that the Reports by the responsible Inspector of the Board and the appointed expert, Mr. Ball, be read as evidence. Those reports, with the opinions there presented, remain the **only independent expert analysis** yet undertaken into the desirability, sustainability, acceptability, viability of this project, in common sense and in planning terms, and free of any vested interest. We therefor refer these reports to the planners of Mayo County Council as evidence, and essential reading before planning decisions on this application are made.
There re some major departures in this application from the second original, relating to height of terminal, removal of created waste, seeding of bog with 36,5000 tons of cement, road u-turns and increased traffic of enormous proportions and weight, the dump site at Srahmore and its implications etc.

TO Sum Up:- From early July 1957, when an oil industry attorney from Wichita, Kansas - an Irish American with a great affection for Ireland - was introduced to the Director of the Geological Survey of Ireland by Aindreas Ó Cuív, the then Attorney General in the then Fianna Fáil Administration, until the first gas was brought ashore, 20 years elapsed, 20 years of intense if sporadic work. This project seeking permission, is precipitate, hurried and unconsidered, and quite outside the normal time frame for this type of development.

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Re. Planning Permission to construct a Gas Reception and Treatment Terminal and Ancillary Works at Ballinaboy, Ballygelly South, and Associate Works, being a Dumping Site for Newly Created Waste at Srahmore, and the Transport of Same Waste and Other Necessary Materials between Ballinaboy and Srahmore, as contained in File No. P03 - 3343 in Mayo County Council Planning Department.

WE, the undersigned, individually and collectively, in view of the comments preceding and the experience of 2 previous applications for planning permission for the same project, or part project, wish to record our opposition to the granting of planning permission for the above described project, as is before Mayo County Council.

Our concerns include:- 1 The potential damage to the environment and to the fishing industry at the proposed outfall from pollutants in the effluent discharged.

2 The danger to health from the aerial emissions from the multiple process engaged in at the terminal when in operation.

WE are aware that applications covering 1 and 2 are not before Mayo County Council at present, but we believe that the resulting project splitting makes this application untenable. 3 The inevitable silting and pollution damage to waterways upstream and downstream from the proposed terminal, especially and including Carrowmore Lake, the one source of potable water for the Erris Regional Water Supply, the Glenamoy catchment and Sruth Mhada Con, and their associated SACs and SPAs, all important salmon and sea trout spawning and passageways. 4 The inevitable degradation of environmentally sensitive and valuable areas of national and European importance and so designated.

5 The hydrological nightmare and destructive potential of silting and bursting of a very liquid peat at the site of the terminal and at the proposed deposition site and the consequences of such movement.

6 Roads: the needs of the local population during the proposed 2 years of construction not taken into consideration: the traffic plan as proposed and accepted by Mayo C o. Co. in advance of application for planning permission amounts to a quarantine as neither the quality of the existing roads or their orientation permits their modification to accept such an enormous burden of heavy traffic. As an example: if the proposal is accepted it will no longer be viable for us in the Ceathrú Thaidhg area to use the Bangor "bealach" or "route" to Ballina or Castlebar or Belmullet and consequently shopping patterns will of necessity change: and changes have a habit of being permanent. 7 The proposal is speculative in many of its elements and in no way essential to the development of the area on which it impacts, nor do the potential advantages postulated compensate for the immediate and ongoing deprivation of the community of the integral advantages of living and rearing one's family in this primal environment.

8 Except in a most speculative and wishful way it does not provide infrastructure that will enhance the potential of the immediate area.

9 The proposal is inherently obtrusive and impinges directly on the Carrowmore SAC. The effect on the visual amenity of the area for the local residents, the permanent population, is dire, representing a constant reminder of a sleeping potential danger from its operation or from emissions. The cumulative evidence of unforeseen disasters would have a disastrous effect on the confidence of the local population in the benignity of their native environment. (Algeria, China, what to-morrow?)

10 Noise impact - 24 hour operation, lawnmower - even as acknowledged by developer, would inevitably destroy the amenity of a non-industrial environment for the local population. No effort is made in the EIS to quantify this material loss in compensatory, i.e. financial terms: an application not beyond the capacity of basic cost accountancy.

11The effect of the physical and chemical changes and dynamisms to be introduced into the ecosystem by this proposal are not enumerated: the acceptability of the

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proposals is predicated on a blind acceptance of the will/ability of Bord na Móna/monitoring based on inhouse information dispersal. We call this an act of faith in an agnostic world.

12 Untried, untested technologies abound. The rehabilitation process is speculative, and at variance with normal practice and expectancies. No cost-benefit analysis is done with respect to the local area, the county, the Objective One Region of which it is a part, the State or the E.U. We have consistently, since the year 2,000, requested that this minimum requirement for any business proposal be implemented. Without it we have a pig in a poke.

13 The immediate and ongoing economic/financial cost of the proposed project is nowhere addressed: a normal practice where landscape values are reduced/lost to a community undergoing industrialisation, as is proposed. Such a valuation in real terms is normal practice.

14 Nowhere are we shown the methodology whereby previous Bord na Móna experience and practice is modified to take into account the variables represented by this project, or the extent and results of the modelling of such methodology. Without it, the proposals are mere verbiage. For example, the extent and result of trials indicating the likely behaviour of dumpers used in the Haku system when milled peat is replaced by peat slurry, of undefined consistency.

15 We note elements of high quality in the EIS and Technical Supplements accompanying the application for planning permission. We remind the planning authority however, that the general language used, and the selection of material demotes the EIS from a purely technical document to one of undoubted advocacy. In this context, we refer the authority(speaking in the concrete) to the qualification by RSK ENSR Environment Ltd., who prepared the application and EIS for the applicant, its client Shell E & P Ireland Ltd., :

"The report may not be relied upon by any other party without the express agreement of the client and RSK ENSR".

also

"Where any data supplied by the client or from other sources have been used, it has been assumed that the information is correct."

We do not rely on it unreservedly: neither do we assume that the information borrowed to the EIS is correct. WE recommend the same caution to the Planning authority.

WE propose to the Planning Authority officials that the evidence in support of the application under consideration is inadequate, even under the minor scrutiny to which we subjected it. We propose that the issues aforesaid are inextricably linked, as are issues relating to the blasting between the terminal and the landfall and through Broadhaven Bay, whatever legalisms may or may not interpose. No one aspect of this proposal is ringfenced by the nature of the proposal.

The foregoing issues are, at root and remain so, concern for the health of the public, of which we, individually and jointly are an integral part, and for the environment of land, sea and air, the health of which we mirror: ***aer glan, aer slán, pobal slán***. WE request that this illogical and illconsidered application be refused.

Signed by the following, on their own behalf without prejudice to other such submissions as they, individually or severally may otherwise lodge with regard to this project:-

Micheál Ó Seighin, Ceathrú Thaidhg.

Uinsionn mac Graith, Ceathrú Thaidhg.

Caitlín Uí Sheighin, Ceathrú Thaidhg.

Uinsionn mac Graith, Ros Dumhach.

Treasa Ní Ghearraigh, Ceathrú Thaidhg.

Bríd Ní Sheighin, Ros Dumhach.

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Terminal EIS. Volume 1.

Because of the repetitious nature of the EIS volumes, it is very difficult to respond in a reasoned structured way. We regret any repetition. These comments are not in any way comprehensive: that is the business of the planning authority.

Table P1: Changes to Scheme from earlier submission for planning is not at all complete -the pressures on road by HVT, a road previously out of bounds for HVT?
Table P4: is list of consultees complete? EPA? Marine Institute?
Exposure to noise 24 hours a day does not contribute to a sustainable community, in an area of negligible background noise.
Ponds: based on Bord na Móna - how were dimensions decided on?
3.2.4. Health and safety Management - see Algeria blast.
Table 3.1.: 100 people on road construction? Co.CO. staff? Are Co.Co to be sub-contractors for Shell or Bord na Móna who would hire them on an ad hoc basis to repair/maintain Council roads? It seems to make the entire Council, individually and wholly, as subservient and irrelevant as Mayor Brady says they are in Dublin.
Peat Soil Improvement: How tried and tested is this technology; no references accompany the blurb.
Windrowing: surely applies to milled peat, not to Bailey's or the other discoursive option. Even dealing with a single sod of hand cut peat, the drying after 8 days would be a miracle: but even that is not in any way comparable. Windrowing refers to heaps of milled peat that has been removed to a depth of 1 inch after an initial drying by heavy drainage of 8 years minimum? Calling a donkey a cat leaves the donkey an ass.
4.4.4. No one disputes the fact that this proposal if implemented is obtrusive.
Refrigeration after some time: this is an integral part of the project and not including it in the application for planning permission is project splitting and therefore unacceptable.
5. Tourist survey is funny.
5.5.2 Security -another keyword in p.r. word processor.
5.7.E.M.G.The existing E.M.G. is a bad joke, and Shell is not responsible for this: it has no expertise, no commitment no independence: Shell representative alone has access to relevant information and so the capacity to monitor. The representative of the Dept. of the Marine, at the initial, founding meeting, refused to allow as a member anyone who has questions about the sustainability of the project: Mr. Daly is on video tape so declaring. And you think this is monitoring?
6. Bird survey relates to immediate site only, for it is a well known fact that the birds in Erris do not stray far from home.
8.4.6. Various animal carcasses: now that's an interesting one for important people. Have the carcasses and surrounding areas been tested for the presence of toxic chemicals: this issue surfaced at oral hearing.
8.10"*some local shrinkage*"as a result of de-watering: given by Tobin's (remember them - ?) in their published report to Mayo Co. Co. as the main cause of the hill collapse in Glengad. Any implications here?

9.2.2. Ceathrú Mór Lake is *nutrient poor*?: is that why it was closed to fishing in 2003 because of bloom?
9.6."*Siltation of watercourses is not expected to occur as a result of this development.*" No one believes this: it does not correspond to normal experience.

8 of 12

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Appendix I. Oil industry publication presenting a summary of the fiscal and lease terms in the Irish offshore regime.

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Introduction

This directory was produced initially in 1997 primarily to back up our concession map series on West Britain and Ireland and to provide ready answers to our map user's questions. This issue is a low cost part revision of the original directory. I have had to cut it back a bit due to a general lack of money in the Industry. Hopefully when things get better I will be able to expand it again.

The current low in the oil industry which has begun to hit Britain since the begining of the year does not seem to have hit Ireland yet. We are still a 2-4 wells a year province and is expected to remain so for a couple of years. Interest in the sector is still high judging from the number of delegates attending the Petroleum Affairs Division(of the Department of the Marine and Natural Resources) Conference on the Irish Sector at the end of April 1999. Indeed, the recent awards of acreage in the South Porcupine Round to Elf and Agip were possibly beyond industry expectations considering the current state of the industry. The high cost, high risk, difficult working areas like the west coast of Ireland and the "Atlantic Fringe" are among the first areas to suffer when oil prices are low.

As we do not have year round activity offshore Ireland we do not have a full time exploration servicing activity with the exception of Cork where the Kinsale Head platform servicing operation is carried out from. The part time servicing operations of other service ports are in danger due to labour disputes. Enterprise's decision last year to largely service its west coast exploration programme out of Ayr in Scotland due to Irish labour disputes sets a dangerous precedent.

On a more positive note there are at least two interesting developments since the last edition of this directory. Firstly, it is great to see that there are Irish companies researching, manufacturing and providing services to the international exploration market in the marine technology area and getting active support from the Marine Institute. Secondly, about sixty to seventy people turned up for the first meeting recently of what is to be known as the PESGB -Irish Branch (Petroleum Exploration Society of Great Britain). This is was a great turnout considering the number of oil exploration offices in Dublin. Meetings are to be quarterly and the next meeting is in June 17th (1999) and will be hosted by the P.A.D. Anyone is welcome to come along. Further information is available from Ian Wilson (Enterprise oil plc).

I would like to thank everyone who contributed information and the advertisers to make its publication possible.

John Coleman

April 1999.

Editor

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Petroleum Taxation in Ireland

Summary Fiscal Terms for Exploration and Exploitation

by Dermot Corcoran, (Petrogal Energy Services Ltd.), April1999.

The current fiscal terms for exploration and exploitation offshore Ireland, are governed by the provisions, pertaining to petroleum taxation, contained in the Finance Act, 1992. The key elements of the fiscal regime are as follows:

- **CORPORATION TAX** - a rate of 25% applies to profits from oil and gas production on petroleum leases (awarded subsequent to declaration of commerciality) issued before specified *dates. A standard rate of corporation tax (32% at present) applies to profits from oil and gas production on petroleum leases issued after these specified dates.

  **With respect to the 25% corporation tax rate, the relevant petroleum lease must be issued before the following dates:*
  - 1st June 2003 for field discovered under standard exploration licence (< 200m Water)
  - 1st June 2007 for field discovered under deepwater exploration licence (> 200m Water)
  - 1st June 2013 for field discoverd under frontier exploration licence (*Frontier area is designated by the Minister of Energy)
- **DEVELOPMENT COST ALLOWANCE** - the allowance for field development outlays (CAPEX) is 100% in the first year of commercial production with unlimited carryforward for unused allowances.
- **OPERATING EXPENSES** - operating expenses are 100% deductible.
- **EXPLORATION COST ALLOWANCE** - exploration costs can be written off immediately (i.e. 100% write off in Year 1 or as early as possible thereafter). This write off rule relates to all exploration expenses, including those exploration costs that are not field relevant, provided they have been incurred in the 25 year period immediately prior to commencement of field production.
- **ABANDONMENT COST ALLOWANCE** - allowances and loss relief, with respect to abandonment expenditures, are available.

Other key elements of the fiscal regime and the revised licensing terms, for offshore oil and gas exploration and development, include:

- **STATE PARTICIPATION**- None. **ROYALTIES**- None. **SPECIAL TAXES**- None.
- **RING-FENCE** - a ring fence pertains to all upstream activities. However, a limited breach of this ring fence permits onshore minerals losses to be offset against offshore petroleum profits.
- **EXPLORATION PERIOD**
  Standard Exploration Licence - 6 years (divided into 2 periods of 3 years).
  Deepwater Exploration Licence - 12 years (3 periods of 4, 3, and 5 years).
  Frontier Exploration Licence - 15 years Min. (variable with max. of 4 phases)
- **MINIMUM WORK PROGRAM BID**
  Standard Exploration Licence - to indude 1 well in first 3 year period
  Deepwater Exploration Licence - to include 1 well in first 4 year period
  Frontier Exploration Licence - agreed work program only, in first phase

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Licence Types - Terms and Conditions

Licence type	**Petroleum Prospecting Licence.** (Geophysical/Geochemical)
Duration	one, two or three years
Renewal	renewable for a further 2 years or longer if you are a "lease undertaking" holder
Obligations	none
Note:	Allows the holder to do geophysical or geochemical work anywhere in the sector except on acreage held under all other licence types.
Cost	£5,000 per annum

Licence type	**Licencing Option.** (Geophysical/Geochemical Licence)
Duration	Normally one year
Renewal	renewable for a further 1 year on the agreement on a further work programme or longer if you are a "lease undertaking" holder
Obligations	1. has to hold a Petroleum Prospecting Licence. 2. complete agreed work programme
Note:	Allows the holder to do geophysical or geochemical work in the area covered by the licence and gives the holder first right during the life of the option to an exploration licence over all or part of the the area covered by the option.
Cost	£15,000 per block for the first year, £25,000 per block on the 1st anniversary of the option grant.

Licence type	**Standard Exploration Licence.**
Duration	6 years (2 phases, year 1-3, year 4-6)
Obligations	1. In the first three years complete agreed work programme to include one exploration well. 2. before the end of the 4th year propose a work programme for the remaining 3 years of the licence for approval by the Minister. 3. At the end of the fourth year surrender 50% of the acreage unless a 2nd exploration well has been commenced by that date.
Note:	1. Issued where water depth does not exceed 200m 2. Gives the holder the exclusive right of searching for petroleum (including drilling) over all the area covered by the licence.
Cost	£120 per Sq.Km per annum. £240 per Sq.Km on retained acreage after year 4.

Licence type	**Deepwater Exploration Licence**
Duration	12 years (3 phases, year 1-4, year 5-7, year 8-12)
Obligations	1. In the first 4 years complete agreed work programme to include one exploration well. 2. before the end of the 4th year propose a work programme for the 5th, 6th and 7th year of the licence for approval by the Minister. 3. At the end of the fourth year surrender 50% of the acreage unless a 2nd exploration well has been committed to by that date.This second well to be commenced before the end of the seventh year of the licence.

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Licence Types - Terms and Conditions

	Deepwater Exploration Licence (continued)
	4. before the end of the 7th year propose a work programme for the remaining 5 years of the licence for approval by the Minister 5. At the end of the 7th year surrender 50% of the acreage then held unless a 3rd exploration well has been committed to by that date. 6. At the end of the 8th year the licence shall be surrendered unless a 2nd exploration well has been commenced at that date.
Notes:	1. Deepwater Exploration licences are issued in respect of an area, any part of which the water depth exceeds 200 metres. 2. Gives the holder the exclusive right of searching for petroleum (including drilling) over all the area covered by the licence.
Cost	£60 per Sq.Km per annum. £120 per Sq.Km per annum on retained acreage after 1st surrender, £240 per Sq.Km per annum on retained acreage after 2nd surrender, .

Licence type	**Frontier Exploration Licence**
Duration	15 years (4 Phases, Phase 1, year 1-4, other phases by agreement.)
Obligations	1. In the first 4 years complete agreed work programme 2. before the end of the 4th year propose the area to be retained and a work programme for the second phase, the work programme to include an committment for one exploration well. 3. At the end of the second phase surrender 50% of the retained acreage unless a work programme has been approved including a committment to a 2nd exploration well to be drilled by the end of the third phase. 4. At the end of the third phase surrender 50% of the retained acreage unless a work programme has been approved including a committment to a 3rd exploration well to be drilled by the end of the third phase. 5. At the end of the third phase surrender the licence unless a 2nd exploration well has been commenced by that date.
Note:	1. Frontier Exploration Licences are granted WRT an area with special difficulties related to physical, environment, geology or technology and are defined by the Minister as "Frontier". 2. Any work performed in excess of the requirements of an agreed work programme may be carried forward to be credited in respect of a later period. 3. Gives the holder the exclusive right of searching for petroleum (including drilling) over all the area covered by the licence.
Cost	£20 per Sq.Km per annum during 1st phase.£40 per Sq.Km per annum on retained 2nd Phase acreage

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Licence type	Lease Undertaking
Duration	2 years
Obligations	1. the operator must use his best endeavours to establish commerciality and supply the minister with a report annually 2. The holder of a Lease Undertaking shall be the holder of a Petroleum Prospecting Licence during the full period of the Undertaking. 3. Having established the discovery to be commercial, the holder of a Lease Undertaking shall formally apply to the Minister for a Petroleum Lease;
Note:	1. This type of licence allows the operator to appraise a discovery which initially is non commercial and come up with a development plan. 2. Lease undertakings have to be applied for 3 months before the expiry of the exploration licence
Cost	£800 per Sq.Km during 1st year, increasing by £100 per sq.km in each subsequent year.

La Tene Oil Concession Maps & Directories

Our Printed maps and directories are free to exploration company personnel working in the area covered by the map or directory. We mail direct to the oil companies and distribute free at various conferences and exhibitions.The maps and directories are available for sale to other interested parties.

Directories

Irish Hydrocarbon Exploration and Irish Exploration Companies - A Directory & Guide 2nd Edition - April 1999. A complete guide to the Irish offshore area and Irish exploration companies. Free to exploration company personnel working in the Irish Sector. Other interested parties can purchase a copy at £20.00 each. This directory will be updated every one or two years. Listings are free and a listing form is enclosed at the back of this directory.

Free Colour Maps

Ireland and the Irish Sea - Energy Exploration & Production. 2nd Edition August 1995 1:1,000,000. Published by La Tene Maps. This map is out of date & out of print. It is being replaced by a new map of the Irish Sector.

The Atlantic Fringe - Hydrocarbon Exploration & Production. 2nd Edition October 1997. 1:2,000,000. The 3rd edition is in preparation and will be available before the end of June. This concession map covering the frontier areas of the UK, Faeroe Islands, and Ireland

West of Ireland and West of Hebrides - Oil and Gas Exploration. 1st Edition July 1997. 1:1,000,000. Concession map dealing with the frontier areas West of Ireland and West of Scotland. It is being replaced by a map covering West of Hebrides, West of Scotland and The Faroe Islands. - Should be available next year.

Updated colour versions or digital versions without advertisements are available or will be available during 1999. For further details contact: John Coleman on +353 (0)1-2847914.

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Licence Types - Terms and Conditions

Licence type	Petroleum Lease
Effective Date	Gas 8 years from notification of discovery or 6 years from expiry of exploration licence Oil 5 years from notification of discovery or 3 years from expiry of exploration licence
Obligations	1. Within 2 years of the date of issue of a Petroleum Lease the lessee will be required to submit a detailed plan of development, in a format specified by the Minister but including a detailed production profile for the life of the field, for the approval of the Minister. An Environmental Impact Statement of the likely effects of the development on the environment shall also be required.
Duration	1. A Petroleum Lease will be valid for such period as the Minister shall decide and specify in the Lease having regard to the likely production profile. 2. The period of a Petroleum Lease may be extended on terms and conditions as may be agreed by the Minister and the lessee. An application for extension shall be submitted at least one year prior to the expiry date.
Leasehold rentals	The lessee will pay to the Minister an annual rental fee calculated on the basis of £1,600 per sq km until the date of first production. The annual rental fee shall be calculated on the basis of £ 2,500 per sq km from the date of first production and every subsequent year for the remainder of the Lease term. These rental fees will be revised with effect from 1 January 1994 and annually thereafter in line with the Wholesale Price Index as published by the Central Statistics Office.
Licence type	**Reserved Area Licence** A lessee may at any time apply for a Reserved Area Licence in respect of a specified area adjacent to or surrounding the leased area and which is not the subject of an authorisation other than a Petroleum Prospecting Licence granted to a person other than the lessee. Provided the applicant has observed and performed the obligations required under the Petroleum Lease.
Duration	Similar to Exploration Licence
Obligations	Similar to Exploration Licence
Costs	Similar to Exploration Licence

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Health And Safety

The National Authority for Occupational Safety & Health (the Health and Safety Authority) is the government body responsible for offshore safety under the Safety, Health and Welfare (Offshore Installations) Act, 1987 and the Safety, Health and Welfare at Work Act, 1989. These Acts apply to all offshore installations, exploration and production. A number of Statutory Instruments have been issued under the 1987 Act.

In addition, all offshore installations are required to be certified as fit for purpose. Forbairt, the Irish Science and Technology Agency, has responsibility for certification matters.

Regulations made under the 1987 Act provide for the notification of appointment of installation managers, emergency procedures, operational measures to be taken for the safety and the protection of the health and welfare of persons on specified offshore installations and life saving measures to be followed.

Amongst the details contained in the regulations are requirements for:

- the provision and maintenance of Emergency Procedures Manuals;
- the provision and maintenance of life-saving appliances;
- written safety instructions;
- the identification of hazardous areas and areas containing explosives and dangerous substances;
- procedures for the maintenance, examination and testing of equipment, plant and appliances;
- the provision of equipment and operations for radio communication;
- procedures for notifying accidents.

The regulations also contain provisions relating to food, drink, hours worked, medical requirements and the operation of transport facilities in relation to offshore installations.

Safety and Training

Cork City Fire Brigade
Fire Brigade Headquaters, Fire Station, Anglesea Street, Cork
Tel : 021 966333 Fax : 021 310745
Contact: J. Ryan, Asst. Chief Fire Officer.
Provide fire fighting training for the Marine and Offshore industry. Developed an offshore fire fighting emergency course tailored to suit the needs of the offshore

FÁS (Foras Aiseanna Saothair)
Rossa Avenue, Bishopstown, Cork
Tel : 021 544377 Fax : 021 346349
Contact : Niall Reardon.
National Agency - Training & employment authority and safety certification of offshore personnel in Irish waters.

National Authority for Occupational Safety and Health
Head Office: 10 Hogan Place, Dublin 2
Tel: 01-662 0400 Fax: 01- 662 0417

National Authority for Occupational Safety and Health - Regional Office
4th Floor, Government Buildings, Sullivans Quay, Cork
Tel: 021-964900 Fax: 021- 961663
Contact: Mr. Donal O'Shea
National agency for offshore safety.
See "Health and Safety" above

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Environmental Provisions

The Minister for the Marine and Natural Resources has specified certain requirements to be observed by operators in carrying out their activities. These include:

- the maintenance of apparatus etc., in good repair and condition and the use of good oil field practice;
- the preparation of an Emergency Procedures Manual;
- compliance with international conventions relating to dumping of wastes at sea. and in particular prohibition of disposal of oil, oil based drilling fluid and drill cuttings containing oil into the sea;
- control and removal of pollutants, caused by licensee's operations, at licensee's expense;
- reporting procedures for oil spills.

The Irish Marine Emergency Services of the Department of the Marine and Natural Resources has responsibility for marine search and rescue and marine pollution, casualty and salvage response. There is close liaison between operators, the Petroleum Affairs Division and IMES to ensure that environmental requirements are satisfied.

Under the Continental Shelf Act, 1968, as amended by the Sea Pollution Act, 1991, the Minister for the Marine and Natural Resources can make regulations prohibiting or regulating the discharge of oil or other substances from a petroleum exploration or production operation or pipeline.

A development plan submitted to the Minister for approval for the production of petroleum under a petroleum lease must be accompanied by an environmental impact statement. The Minister will take into account this statement and any observations received in connection with it when making a decision on the plan.

Marine Emergencies

Irish Marine Emergency Service (IMES)
Department of the Marine and Natural Resources
Leeson Lane, Dublin 2
Tel: 01-6785444 Fax : 01-618628
Contact: Captain Liam Kirwin

IMES runs the Marine Rescue Coordination Centre and Pollution Response Services.

The Following Numbers are for emergency use only

Marine Rescue Coordination Centre
Dublin (Day & Night)
Tel: 01-662 0922 and 01-662 0923
Fax 01-6620795

IMES has stocks of Pollution Response Equipment Stockpiles at Dun Laoghaire, Co. Dublin; Killybegs Co. Mayo and at Castletownbere, Co. Cork.

Each harbour authority is obliged to maintain a supply of pollution response equipment whilst County Councils in marine counties are obliged to keep materials for clearing beaches.

The main contact numbers are the same for a marine emergency and a marine spillage.

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Future Activity

Future Licensing

At the moment (April 1999) the oil exploration Industry is experiencing one of those cyclical downturns and therefore it is difficult to talk of future licencing in the Irish Sector. It is expected that there will be one or two blocks converted from options to full licences and some acreage taken up under the "Open Door Policy" this year. I would expect that there will be no rounds announced this year. The Petroleum Affairs Division of the Department of the Marine and Natural Resources did well in getting acreage licenced to Agip and Elf in the South Porcupine Round awards announced last month.

The Option and Open Door Systems could be important to the Irish sector in the short term in getting some new acreage licenced as the only significant areas which are currently open for licencing are in the Celtic Sea or Irish Sea, areas which are shallower and cheaper to operate in than the Atlantic West Coast.

Future Seismic

In comparison with previous years seismic activity in 1999 and 2000 will be significantly lower.

Future Drilling

Now is a relatively cheap time to drill for those companies who have committments. The current downturn in the industry should not have any significant effect on drilling levels in the Irish sector. Ireland should still see an average of 2-3 wells a year over the next three years, with the major players still being Enterprise and Statoil. However as far as I am aware there are still commitment wells to be drilled by Chevron, Sherritt International/Frontier, and EDC (European Development Corporation. Exploration or appraisal drilling by Providence Resources in the Celtic Sea is planned between and the end of 2000. Looking beyond that is crystal ball gazing at the moment.

Development

Marathon are still the only operator in Ireland producing hydrocarbons. The Kinsale Head and Ballycotton Fields are producing well above expectations. It is understood that that some further activity will take place this year with a projected tie back from S.W. Kinsale.

Providence (formerly part of Arcon) has a lease over the Helvick dicovery (49/9)and an option on the Ardmore discovery. A lease is a licence to produce hydrocarbons . Providence has put out to tender development plans for Helvick which were developed in the their lease appraisal period. Helvicks reserves have been upgraded to the 15-18 million barrell mark , however this is still quite small and a cheap and innovative production system will be required to make a profit. 1999/2000 will see some activity on the lease.

The major prospect at the moment is Enterprises Corrib prospect offshore Mayo.This gas discovery is to be further appraised this year. A new gas field is what the country needs. However the demand for gas in Mayo is low and some infrastructure will need to be put in place if the product is to reach the end user. I would expect it will be the new Millennium before Enterprise has a good idea of Corrib's size and reserves.

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Government Departments and State Bodies

Department of Marine and Natural Resources- Petroleum Affairs Division
Beggars Bush, Haddington Rd, Dublin 4.
Tel: 01- 6199200 Fax: 01-660 4462
Promotion, regulation and monitoring of the exploration and development of oil and gas in onshore and offshore Ireland. The Petroleum Affairs Division is divided into two Sections An Administrative Section and a Technical Section.

Administrative Section:
Administration, Licence Applications, Well drilling applications:
Mr. Pat Ryan, Principal Officer
Tel: 01-6199567 Fax: 01-6604462
E-mail: ryanp@tec.irgov.ie

Ms. Carmel Murray, Ass. Principal Officer
Tel: 01-6199572 Fax: 01-6604462

Mr. Rory Boyd, Ass. Principal Officer
Tel: 01-6199547 Fax: 01-6604462

Liam O' Brien, Higher Executive Officer
Tel: 01-6199571 Fax: 01-6604462
E-mail: obrienl@tec.irgov.ie

Malcolm Taylor, Higher Executive Officer
Tel: 01-6199570 Fax: 01-6604462
E-mail: taylorm@tec.irgov.ie

Mr. Cormac Judge, Executive Officer
Tel: 01-6199542 Fax: 01-6604462
E-mail: judgec@tec.irgov.ie

Ms. Marion Salmon, Executive Officer
Tel: 01-6199564 Fax: 01-6604462

Technical Section:
Mr. John O'Melia, Clerical Officer
Tel: 01-6199568 Fax: 01-6604462

Dr.Keith Robinson,
Sen. Petroleum Specialist
Tel: 01-6199568 Fax: 01-6199578
E-mail: robinsonk@tec.irgov.ie

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Petroleum Affairs Division (Continued)

Petroleum Speciaist-Geophysics
Mr. Peter Croker
Tel: 01-6199574 Fax: 01-6199568
E-mail: crokerp@tec.irgov.ie

Petroleum Speciaist- Geology
Mr.Noel Murphy
Tel: 01- 01-6199575 Fax: 01-6199578
E-mail: murphyn@tec.irgov.ie

Commissioners of Irish Lights
Head Office: 16 Lr Pembroke St 2
Tel : 01-6624525 Fax: 01-6618094
Contact: Mr Mel Boyd.
The Commissioners have a responsibility to ensure that proposed activities do not pose a hazard to navigation.

Forbairt
Offshore & Coastal Engineering Unit.
Glasnevin, Dublin 9
Contact : Gerard Keane,
Emer Butler, Brendan Dollard
Tel: 01-8082264 Fax : 01-8368139
Certification of offshore installations, environmental downtime studies for offshore explorers & products systems. Advice to Irish companies who wish to service the offshore industry

Irish Marine Data Centre
80 Harcourt St., Dublin 2
Tel : 01-4757100 Fax : 01-4757104
Contact: Bronwyn Cahill
The Irish Marine Data Centre is the National repository of Marine data.

Irish Aviation Authority
Scotch House Hawkins Street, Dublin 2.
Tel : 01-671 8655 Fax: 01- 679 2934
Contact: Mr. Fergus O'Connor
The Irish Aviation Authority is the safety certifying authority for helicopter companies operating offshore Ireland .

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Appendix II:- Blasting requirement as advanced in first EIS (October 2,000), and second EIS (to support planning permission file P01/900.

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8.5.2 *Facilities Installation*

8.5.2.1 Offshore

Generation of noise from installation activities will be lower than that caused by drilling activities. Generation of noise during construction will be lower and of shorter duration than for drilling.

8.5.2.2 Landfall

There will be a range of onshore plant required at the landfall during construction. Typically the onshore spread would consist of the plant listed in Table 8.15. The sound power level and continuous sound pressure level equivalent are also provided.

Table 8.15: Noise emissions from a typical onshore plant for landfall construction

Plant	Sound Power Level (dB)	Activity Equivalent Continuous Sound Pressure Level (LAeq@10m) (dB_A)
150 tonne Tracked Crane	109	81
Vibrating or diesel pile hammer	128	100
Large Tracked Backhoe (up to 3)		
Moxy or large dumptruck (up to 3)	100	82
Tracked bulldozer (D9 or larger)	114	86
Site Transport (2 12 seaters, 3 4x4s)		82
Site generator for power	89	61
Site Compressor (750 cfm)	102	74
Lighting Towers (up to 4)	104	76
Tractor and Trailer (20 tonne capacity)		
Mobile rock drilling equipment c/w compressor	128	100

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Air Traffic Noise Levels

Airborne pipeline inspections will be carried out periodically to ensure the integrity and safety of the pipeline during its operational life. These flights are unlikely to be of sufficient frequency or duration to attract particular attention or cause undue disruption.

15.3 Legislation and Planning Guidance

The Environmental Protection Agency administers Ireland's primary noise control mechanism via the integrated pollution control (IPC) licensing scheme. This applies to ongoing noise emissions from fixed installations, rather than temporary noise generated by construction or installation operations, and will not be of great relevance to landfall construction.

The EPA document *Guidance Note for Noise in Relation to Scheduled Activities 1995* does, however, give guidance on noise and vibration thresholds for quarrying and mining activities. It is understood that these limits will be considered applicable to rock blasting which may be required at the landfall.

It is intended that prior to any construction work commencing at the landfall, noise limits are agreed between Enterprise's contractor with Mayo County Council. Hours of work will also be agreed.

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15.4 Noise and Vibration Control Targets

15.4.1 Construction

Control of noise from the normal activities associated with landfall construction will be achieved by restricting working hours, and by other measures described in Section 16.

Blasting operations, however, must be controlled against absolute limits due to high levels of sound energy involved, which can be intrusive, startling and in extreme cases pose a threat of damage to hearing. The guidance given by the EPA is as follows:

'In the case of quarrying and mining operations, the vibration levels from blasting should not exceed a peak particle velocity of 12 mm/sec, measured in any three mutually orthogonal directions at a receiving location when blasting occurs at a frequency of once per week, or less. For more frequent blasting the peak particle velocity should not exceed 8 mm/sec. These levels are for low frequency vibration, i.e. less than 40 Hertz.'

Although blasting operations associated with the landfall construction may occur more frequently than once per week, the EPA guidance is intended for permanent or semi-permanent sites (mines and quarries). In the context of the temporary landfall construction site, it is considered appropriate to use the higher of the two limits given above.

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Guidance from the EPA states that 'Blasting should not give rise to air overpressure values at sensitive locations which are in excess of 125 dB $(Lin)_{max\ peak}$. Compliance with this absolute limit shall be the responsibility of the blasting contractor, and will require monitoring in sensitive locations.

In any situation where blasting requirements are such that compliance with this limit is impossible, consideration will be given to alternative mitigation options, such as temporary relocation of affected residents.

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stripping may commence there. Rock materials excavated from the northern section of the site will be transported to build-up the administration/maintenance area;

- as areas in the northern section are cleared, excavation of the southern section can commence and similarly progress westwards. Fill materials from the north will be transported and laid in the southern section to produce a level site;

Once peat/till material excavation has been completed, the containment bunds will be seeded with various mixtures of endemic grass, reed and shrub to prevent erosion of the completed areas and to assist reinstatement. Mature turfs of peat recovered from the excavated areas will be planted over the deposited peat to provide protection from the effects of wind and rain to help the seeded areas grow to maturity.

3.3.9 Site Levelling Cut and Fill

Once an area is cleared of peat the underlying gravel and rock strata will be excavated into the slope of the hill to obtain a level site. A combination of excavation and ripping will be used. If the deeper rock is found to be too difficult to rip, it will be prepared by pre-splitting using small explosive charges to open up the joints in the rock and enable ripping to be used. This method creates much less noise impact than the alternative of hydraulic breaking and is therefore preferred.

3.3.9.1. Use of pre-splitting (blasting)

Rock blasting is often the cheapest and most efficient method of extracting large volumes of competent rock. For average rock-types an explosive loading in the order of 0.28 - 0.35 kg per cubic metre of solid rock is sufficient to bring about a satisfactory level of fragmentation.

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It is often wrongly suggested that a weaker blast serves to loosen rock to a degree where it can be mechanically ripped. This is largely incorrect and fails to recognise the fundamental mechanics of blasting. A blast either fully fractures the rock-mass, or it fails. There is no advantage in creating a blast that will fail or partially fail, particularly where a subsequent blast relies on the success of the previous.

Environmental impacts associated with rock blasting arise from:

- ground vibrations. – see below;
- noise (air over-pressure) – controlled by good practice;
- fly-rock – controlled by good practice and delineated risk zone;
- dust. – probably the biggest source of environmental dust in quarrying controlled by using bigger less frequent blasts.

In most cases, a regulatory body will impose limits on these environmental impacts. The limits for a temporary construction works can be expected to be similar as those that appear in the form of conditions to planning permissions for quarries. Some leeway may be

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Ground improvement by either vibro stone columns or vibro concrete columns.

This technique would require the placement of columns on a regular grid covering the complete area of the proposed works followed by a geogrid reinforced granular mattress. This would create a sound working platform for the construction of the works.

This method has been discounted due to the need for in excess of 10,000 columns. The equipment to install the columns would also require stable working platforms, necessitating the import of additional fill because the peat would not provide a stable working platform. The environmental impact would be significant in terms of traffic movements related to the import of concrete for the columns and the temporary and permanent fill materials. Furthermore this method would result in the Terminal being built at a higher elevation creating a more significant visual impact.

Surcharging the peat.

Surcharging of peat requires a considerable thickness of fill to be laid on the peat. The thickness can then be reduced after design settlement has been achieved. This solution has been discounted because the would have to be transported to the site generating significant vehicle movements. It would result in the Terminal being built at a higher elevation creating a more significant visual impact. The long term settlement will also have an impact over the life of the plant because, although the peat has been compressed, its engineering characteristics will continue to be uncertain and hence lead to uncertainty in determining future differential settlement.

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Creation of fully piled concrete raft.

Creating a piled concrete raft for an area of equipment and/or structures offers the advantage that it would act as a single foundation for all the works both temporarily and permanently. However, it has been discounted because it would require a significant volume of imported fill to create a level area. Furthermore, the number of piles would increase to around 20,000 and the volume of reinforced concrete to around 30,000 cubic metres. The import of this fill and ready mixed concrete would generate significant environmental impacts related to vehicle movements.

Addition of a graded fill blanket.

The principal of this alternative is to leave the peat in place and introduce a complete blanket coverage of a graded rock type fill over the entire area of the site. This was discounted because the volume of fill required would be so large that an available local source would be difficult to find.

The capacity required to supply the fill at the rate per day needed for effective placement was considered excessive. Settlement problems related to the characteristics of the peat would generate maintenance issues during the life of the Terminal because the unpiled areas would

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Table 11.3: Typical Noise Levels Associated with Various Construction Activities.

L_{Aeq} dB calculated from BS 5228 at varying distances					
Construction activities	**50 m**	**150 m**	**250 m**	**350 m**	**450 m**
Initial access & fencing	76	67	62	59	57
Site preparation	74	65	60	57	55
Topsoil stripping & site grading	82	72	68	65	63

Due to the nature of the processes involved, noise levels will not be constant, fluctuating with operating periods for each item of plant and the combination of machinery being used at any one time. Noise levels will also vary depending on time, and distance from the Terminal site. Neighbouring residents will not, therefore, be continually exposed to the noise levels shown above for extended periods.

11.5.12 Road Traffic Noise

Construction traffic associated with the Terminal construction will be routed via main roads as far as is possible, (**Section 15.0**). Due the rural nature of the area, however, some minor roads will have to be used for access. These routes will be agreed with Mayo County Council and are subject to a separate traffic study.

The increase in traffic movements on minor roads is likely to cause a noticeable increase in daytime noise levels, however this effect will be localised and temporary, and will be restricted to the construction phase of the scheme.

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11.5.13 Blasting

The construction of the Terminal will require large movements of material within the site. A large proportion of this material will be excavable by back hoe such as peat, which poses difficult engineering challenges but is likely to result in relatively low levels of noise and vibration. In addition small areas may require the controlled blasting of bedrock or the use of ripping/rock breakers, which will produce significant levels of both noise and vibration. Its extent, nature and depth will be determined by a detailed borehole survey prior to construction.

Once the details for blasting operations are known, it will be possible to include mitigation measures to minimise the potential for damage and nuisance. These measures will include the limitation of peak particle velocity by expert design of explosive charges and control of ground propagation where possible. Noise levels generated by blasting operations cannot yet be assessed, as the detailed requirements are unknown at this stage.

Special consideration will be given to any blasting proposed in close proximity to residential properties. Detailed liaison with Mayo County Council will be required in these situations.

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The extent of blasting operations will be minimised by using alternative excavation techniques such as impact rippers wherever possible, although blasting cannot be avoided in all cases. Where blasting is required, the frequency of blasting operations will be minimised and blasting times will be restricted to normal working hours and will avoid weekend working.

The appointed contractors will provide adequate warning to the public by mailshotting and/or notification in the local press. The size of the charge and the blasting procedures will be defined and agreed in advance with Mayo County Council and the Gardai.

11.5.1.4 Piling

It is thought likely that impact piling will be employed, using pre-cast concrete piles and a traditional piling rig. The piling operation will constitute a short phase early in the construction process, such that any resultant impact will be short-lived.

It is possible to control the levels of noise and vibration generated through impact piling, by adjusting the force applied on each impact cycle. Reduced impact force, however, reduces the process efficiency such that the operation takes considerably longer. It is usually found that the benefits of slightly reduced noise levels are out-weighed by the resultant increase in exposure duration. Only in extreme cases, usually due to very close proximity to residential properties, is this justified.

Good communications and public relations are the most important factors in minimising the adverse affect of this inevitably noisy process in the early stages of the construction program.

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11.5.1.5 Other Site Operations

In addition to the operations above, the movement of large volumes of peat will necessitate the need for pumps on site. In addition generators will required for security lighting at night.

The combined noise levels for one diesel pump and one generator predicted from BS 5228 are shown in **Table 11.4** below:

Table 11.4: Combined Noise Levels from One Diesel Pump and One Generator

Distance from source (m)	50 m	150 m	250 m	350 m	450 m
Noise Level $L_{Aeq,15min}$ dB	70	60	56	53	50

Appropriate noise control measures will be implemented to minimise noise emissions. The contractor will also be required to liaise directly with Mayo County Council.

The limited period of construction and compliance with the requirements for mitigation of noise and vibration will ensure that impact on the local environment is kept to an acceptable level.

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best practicable means mitigation measures described above. Noise levels will not exceed 60 dB(A) expressed as Leq, 1 hour during construction, however during normal construction operations noise levels will be 55 dB(A) or lower.

Blasting operations, however, must be controlled against absolute limits due to high levels of sound energy involved, which can be intrusive, startling and in extreme cases pose a threat of damage to hearing.

Guidance is taken from the EPA document *Guidance Note for Noise in Relation to Scheduled Activities, 1995* which states in Section 3 that 'Blasting should not give rise to air overpressure values at sensitive locations which are in excess of 125 dB $(Lin)_{max\ peak}$. Compliance with this absolute limit shall be the responsibility of the blasting contractor, and will require monitoring in sensitive locations.

11.7.3 Vibration Control Targets

Only blasting activities are considered likely to give rise to vibration levels of sufficient magnitude to warrant absolute threshold limits. The guidance given in *Guidance Note for Noise in Relation to Scheduled Activities, 1995* is as follows;

'In the case of quarrying and mining operations, the vibration levels from blasting should not exceed a peak particle velocity of 12 mm/sec, measured in any three mutually orthogonal directions at a receiving location when blasting occurs at a frequency of once per week, or less. For more frequent blasting the peak particle velocity should not exceed 8 mm/sec. These levels are for low frequency vibration, i.e., less than 40 Hertz.'

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Although blasting operations associated with the Terminal will occur infrequently, the EPA guidance is intended for permanent or semi-permanent sites (mines and quarries). In the context of the Terminal, it is considered appropriate to use the higher of the two limits given above.

11.7.4 Operation Impact Mitigation – Terminal

Minimising noise has been an integral part of the design of the Terminal. For example:

- gas turbines will be acoustically insulated, inlet and outlet pipework insulated and all housed within buildings;
- the fired heaters have been strategically placed as far away as practicable from known sensitive receptor sites; and
- stringent noise limits have been specified with octave bands for each item of equipment listed in **Section 9.8.4.**

The Environmental Protection Agency administers Ireland's primary noise control mechanism via the Integrated Pollution Prevention Control (IPPC) Licensing scheme. This will apply to ongoing noise emissions from Terminal operation.

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19.9 Hydrology

19.9.1 Introduction

This section summarises the findings of a hydrological desk based assessment, which was carried out along the proposed Corrib pipeline route between the landfall at Dooncarton and the proposed Terminal site. This desk-based assessment was undertaken by RSK Environment Ltd.

19.9.2 Study Methodology

Geological mapping (at 1:100,000 scale) and topographical mapping (at 1:50,000 and 1:10,000 scale) of the area were examined. Reference was also made to published and unpublished studies of peat hydrology.

19.9.3 Receiving Environment

The pipeline crosses a low-lying coastal area. Groundwater is never far from the surface and in places the ground may be periodically saturated. This is an area of high rainfall and the ground is slowly permeable, consequently there is a significant percentage of surface runoff. The pipeline has two major water crossings, the Sruwaddacon Bay and the Glenamoy River. Apart from these there are no significant surface water crossings. Because of the high groundwater table, water inflow into open trenches could be a problem. The saturation of the peat may also lead to difficulty in keeping the trench open.

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Principal factors affecting the hydrology of the pipeline route are:

- rainfall;
- superficial and solid geology;
- vegetation; and
- artificial drainage.

19.9.3.1 Rainfall

Average annual rainfall in this coastal maritime area (recorded at Belmullet, 1961-1990) is 1143mm.

19.9.3.2 Superficial (Drift) Geology

Section 19.8 deals with geology in detail. The discussion here presents the geological aspects relating to ground and surface water.

From the proposed Terminal location to the Glenamoy River the route is underlain by peat. Underlying the peat is about one metre of clay, beneath which is gravel. North of the Glenamoy River, peat is still found at the surface however it is thinner than that nearer the Terminal. Further west, along the shoreline north of Sruwaddacon Bay, the peat thins significantly and may be absent altogether. Here a typical section may encounter thin

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topsoil overlying a metre or so of sand and gravel which in turns overlies weathered bedrock.

Along the Dooncarton section of the pipeline, to the west of the Sruwaddacon Bay the drift consists of thin topsoil overlying sand and gravel.

The current groundwater hydrology of much of the site is broadly characterised by a high porosity and predominantly low permeability peat overlying low porosity low permeability fissured bedrock. In many places the peat is likely to remain at or close to water saturation throughout the year. The water content of the saturated peat is likely to be equal to or greater than 90% by weight. However, the specific yield of the peat (that is to say the water that would drain by gravity) is likely to be in the region of 30-50% depending on the degree of humification (see below).

19.9.3.3 Solid Geology

From where the pipeline comes ashore at Dooncarton the underlying solid rock is hard and fractured, consisting of quartzite and schist with lesser limestones and gneiss. However, it is only really along the north-shore of the Sruwaddacon Bay that any length of rock is likely to be encountered in excavations.

Much of the bedrock underlying the superficial deposits is permanently saturated. Both bedrock and the bulk of the peat have low permeability and so are slow to drain. The unweathered bedrock, unlike the peat, will also have low porosity (perhaps <1%) and will therefore have relatively little groundwater storage. Faults and fissures in the rock account for most the bedrock porosity.

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19.9.3.4 Vegetation

As a direct result of the high rainfall the vegetation is this area is particularly lush. From the landfall at Dooncarton the proposed route traverses improved and semi-improved agricultural fields. To the southern side of Sruwaddacon Bay, the pipeline crosses an area of conifer plantations.

19.9.4 Characteristics of the Proposed Development

19.9.4.1 During Construction

19.9.4.1.1. Trench Construction

All construction activities will normally be undertaken within the working width, a fenced strip of land generally 40 m wide. Where necessary new field drains will be installed within the working width or just outside to prevent possible water-logging.

A potential impact of the proposed development, with respect to the water environment, may be a temporary decrease in water quality in local watercourses, due to the sediment laden water which will have to be drained from parts of the trench during the construction phase.

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3.6.2 Nearshore Pipeline and Landfall Preparation

3.6.2.1 Onshore

Preparatory work will be carried out during early spring of the pipelay year to establish bases for two linear winches, which will be used to pull the pipeline ashore. The winches (typically with a 250 tonne pulling capacity) will be mounted on concrete pads. The winches, which are approximately 8 m x 3 m, will be anchored by wire ropes on their landward side to drilled rock anchors, or a sheet piled anchorage, to counteract the pulling load. The type of anchorage will depend on the results of site surveys carried out prior to installation.

3.6.2.2 Landfall

The pipeline approach through the low, clay cliff and beach at Dooncarton will be excavated by conventional land-based earthmovers. All excavated material will be stored within the pipeline working area. The winches and other equipment required will then be brought to the site via local roads. Behind the winches, two hydraulically operated wire rope reel winders will be positioned to receive the pulling wire from the winches. Public access to the site will be restricted by the use of barriers and signs erected to indicate alternative paths around the work area. Given the relatively shallow depth of the bedrock, it is unlikely that a cofferdam would be needed to keep the trench clear of excavated sediment.

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Below the high water mark the trench excavation will be carried out by tracked vehicles with hydraulic rock breaking tools. These will progressively work away from the landfall during low water creating the deep trench. Other specialised vehicles will remove the rock and sand materials to storage. It may be necessary to construct a temporary causeway in the shallow water in order to provide access to the area below low tide, referred to here as the surf zone.

Construction of the trench in the surf zone (i.e. below low water) will be by a powerful backhoe dredger/excavator operated from a self-elevating platform. A multi-point mooring system may be used to help position the platform prior to it being jacked up to operating level.

The trench spoil will either be placed into a split hopper barge or side cast for subsequent reuse.

A similar platform will also carry out any required rock blasting as described below.

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3.6.2.3 *Inshore*

The construction of the pipeline, from a position within Broadhaven Bay to the landfall at Dooncarton, will be carried out in a different manner to the remainder of the offshore pipeline. This is because the draught of the main pipelay vessel excludes it from the shallower water, but also because of the need to realign the pipeline inshore to avoid areas of rock at or very close to the seabed. Where such ground conditions cannot be avoided, a trench will have to be cut in rock. This preparatory work is discussed below.

Surveys have already taken place along the route of the pipeline within Broadhaven Bay, from approximately 1 km offshore to the high water mark (HWM). These surveys have determined the depth and type of bedrock, and the properties of the overlying sediments, enabling an accurate estimate to be made of the task for preparing a trench for the pipeline in this area. The survey has identified the requirement for blasting at some inshore locations. Fine tuning of the exact route is ongoing in order to minimise the extent of rock blasting. However, it is almost certain that some blasting operations will be required for approximately 500 m from the low water mark outward.

Underwater blasting has the potential to create significant impacts on the environment if the work is not properly planned and executed.

In air, noise is well recognised as a pollutant. This is a view which is increasingly being applied to underwater noise. The impacts are discussed in detail in **Sections 7 and 11** of this EIS. In summary here, for the purposes of explaining the proposed construction methods and associated mitigations, the three most significant effects of underwater sound on fish and other marine mammals are listed:

- direct harm to marine mammals, fish and other aquatic fauna, either physically or by causing changes in their normal behaviour;
- indirect harm via effects on food species (e.g. on marine mammals when fish are driven away); and
- the commercial effect of localised depletion of exploited fish stocks.

The underwater blasting will be carried out from the deck of a self-elevating platform (**Plate 3.1**) that will be towed into the bay and positioned, possibly with the aid of anchors.

The platform will be equipped with a percussion hammer drill rig, stores containers, emergency accommodation, and power generators. The drill rig is on skids and can be moved around on the deck of the platform so that it can prepare a grid-like pattern of shot holes. Hole spacing is selected to achieve a number of objectives:

- effective fracturing of the rock to the required depth of trench in a single blast;
- the need to ensure that all charges are detonated (if a charge is not detonated by way of the detonator it will be detonated by the charges adjacent to it); and
- minimising the time spent on site preparing the blasting pattern.

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19.11.5.1.4 Blasting

A large proportion of the pipeline trench will be constructed in materials excavable by back-hoe such as peat, sand, gravel and broken rock, which poses difficult engineering challenges but is likely to result in relatively low levels of noise and vibration. In addition a small number of rocky areas will require the controlled blasting of bedrock or the use of ripping/rock breakers, which will produce significant levels of both noise and vibration. Its extent, nature and depth will be determined by a detailed borehole survey prior to construction.

Once the details for blasting operations are known, it will be possible to include mitigation measures to minimise the potential for damage and nuisance. These measures will include the limitation of peak particle velocity by expert design of explosive charges and control of ground propagation where possible. Noise levels generated by blasting operations cannot yet be assessed, as the detailed requirements are unknown at this stage.

Special consideration will be given to any blasting proposed in close proximity to residential properties and sensitive or historic buildings. Detailed liaison with Mayo County Council will be required in these situations.

The extent of blasting operations will be minimised by using alternative excavation techniques such as impact rippers wherever possible, although blasting cannot be avoided in all cases. Where blasting is required, the frequency of blasting operations will be minimised and blasting times will be restricted to normal working hours and will avoid weekend working.

The appointed contractors will provide adequate warning to the public by mailshooting and/or notification in the local press. The size of the charge and the blasting procedures will be defined and agreed in advance with Mayo County Council and the Gardai.

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19.11.5.2 Commissioning and Testing

Rigorous commissioning and testing procedures are required prior to operation. These will include hydrostatic pressure testing of the whole pipeline section by section.

These tests, which will be continuous for several days and nights, are unlikely to give rise to significant noise levels along the pipeline itself, but pumps and compressors are needed to fill and pressurise the pipeline at the test end. Generators will also be required at selected locations along the route for security lighting at night.

The combined noise levels for one diesel pump and one generator predicted from BS 5228 are shown in **Table 19.11.4.**

Table 19.11.4: Combined noise levels from one diesel pump and one generator

Distance from source (m)	50 m	150 m	250 m	350 m	450 m
Noise Level $L_{Aeq,15min}$ dB	70	60	56	53	50

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28/01/04
Rs 6433

SCANNED

Ballinaboy
Barnatra.
Ballina.
Co.Mayo
26th Jan 04

Dear Sir

We the Ballinaboy Leenamore residents wish to object to the planning application for the Ballinaboy Bridge gas terminal by Shell Ireland (Ref p0333430). We object for the following reasons.

(1) Peat removal to Srathmore Bangor involving in excess of four hundered lorries a day going through our village putting our safety and the safety of our children at risk.We believe that Mayo Co Council will understand the difficulty the residents will experience in living their lives as normal during the peat removal and the construction phase of this development should planning be granted.

(2) Visual impact. The Terminal with its tall structures will always be visible from residents properties, surrounding villages and roads. This building cannot be hidden behind a bunch of trees regardless of what the developer and its consultants would like one to believe. The terminal is out of context with surrounding area.

(3) Noise. There will always be noise emanating from the terminal during its Operation. This will interfere with the peaceful living the residents are Accustomed to. One must also take into account the huge amount of noise Generated during the construction phase which is another form of disruption For residents. After reading page xv in the Non-technical Summary Volume 1the residents are concerned about the possibility of night- time work as the following is stated Exceptional operations, such as restricted night-time working, will only be carried out after proper consultation and liaison with the local authorities and the Environmental Monitoring Group to limit their impact;
Consideration to be given to use of vehicle reversing lights during hours of darkness instead of the usual reversing bleepers. The Ballinaboy-Leenamore residents are normal living human beings and to live we need our SLEEP.

Odour from Terminal operations is also a concern for residents.

(4) Air Emissions.The residents understand this does not fall under the remit of Mayo Co Council but we take this opportunity to sate that we will always worry about the affect the emissions associated with this terminal will have On our health.

The residents also believe their properties will be devalued if this terminal Is built on our doorsteps. Who wants to live beside a gas terminal? We certainly don't.

At this stage we would like to remind the planning Authority of the previous Planning application by Enteprise energy Irl for the terminal for which they Gave approval and in turn was refused by Board Plaenala. Taking this into account and the above concerns the residents are asking the planning Authority to go through the present application by Shell Ireland carefully, and refuse planning permission for this development.The residents remain convinced the site chosen is unsuitable.

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Once more we urge Mayo Co Council to refuse planning permission for the Ballinaboy Bridge
Gas Terminal.

Your Sincerely
Jacinta Healy
On behalf of the following residents.

Maeve Healy.
Jimmy & Marie Healy
James + Jacinta Healy.
John Healy + Ann Healy
Martin Healy
Brendan & Mary Conway
Seamus Healy Mary Kate Healy
Bridget Conway
Paul & Margaret Healy
Patrick Healy
Maggie Healy
Bernard & Ethna Sheeran
Seamus Murphy Bridget Murphy
Martin Healy, Tom, Ballinaboy
Tom & Antoinette Healy
Ann Healy (Martin)

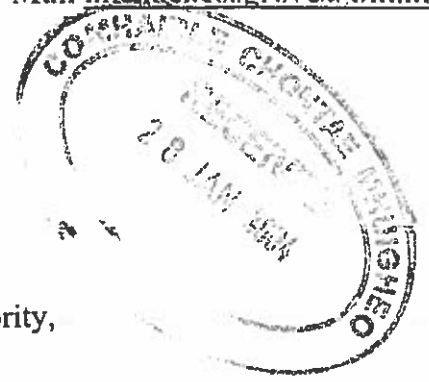
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North-West Mayo Development Group

Bellacorick, Ballina, Co Mayo

☎ 096/53103 Fax 096-53116
E-Mail michael.cosgrove@bnm.ie





26/01/03

The Planning Authority,
Mayo Co Council,
Castlebar,
Co Mayo.

To whom it may concern,

At a recent meeting of our group it was decided to support the Corrib Gas coming ashore at Bellanaboy. We want it to be known to the Planning Authority that we full support this development and we feel it will be a great assistance to the area in terms of employment.

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Yours Sincerely,
M. Cosgrove
Secretary

Rno 6420 €20-
28/11/04



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BALLINA CHAMBER OF COMMERCE

(Affiliated to The Chambers of Commerce of Ireland)

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Ballina,
Co. Mayo.
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Web: www.ballinachamber.com

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Ann Mullins
Kieran Quinn
Audrey Robinson
Fr. Muredach Tuffy

Rno 6421 €20
28/1/04

File Reference Number: **P03/3343**

Statement from Ballina Chamber of Commerce in Support of Shell E&P Ireland Limited's Application to Develop the Corrib Natural Gas Field

The Ballina Chamber of Commerce would like to broadly support Shell E&P Ireland Limited in their application to develop the Corrib Natural Gas Field.

The Chamber believes the investment of €830 million for this project will be a great economic boost to the area.

Should the gas be made available to towns in Mayo such as Ballina it will act as a catalyst in attracting industry to the area. This is a valuable natural resource that should be used to this region's advantage.

The Ballina Chamber of Commerce is also very conscious of environmental issues and is fully supportive of Shell E&P Ireland subject to all planning conditions being met.

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Principal Administrative Officer
Planning Section
Ground Floor
Mayo County Council
Aras an Chontae
The Mall
Castlebar
Co Mayo

27th January 2004

Dear Sir/Madam

Re: Planning Application by Shell E & P Ireland Ltd for the Development of a Gas Reception and Separation Terminal at Bellanaboy Bridge, Bellagelly South, Co Mayo.

Planning Register Reference P03/3343

€20
28/1/04
Rec 6424

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We are writing in support of Shell E & P Ireland Ltd's planning application for a gas terminal at Bellanaboy Bridge, Co Mayo.

We are aware of the particulars in relation to the overall Corrib gas field development and understand that the proposed terminal is an integral and essential part of the works. With regard to the terminal itself, we are aware of its principle features and would note the following:

- The development of the Corrib gas reserve, including the terminal are essential elements in providing a continued indigenous gas supply for the Country.
- The development of this infrastructure can only be seen as sustainable.
- The development of Corrib Gas is an essential part of developing future gas and electricity infrastructure in the west of Ireland..
- The development will provide a sustainable basis for attracting industry to this part of the Country.
- The terminal is located in a lightly populated undesignated area.
- The visual impact of the terminal is almost negligible.

Having regard to the above, we trust that the County Council will, as we do, deem this project to be of substantial regional and national importance and grant planning permission.

Yours sincerely,

Brendan Butler
Director

SCANNED

DIRECTOR GENERAL
TURLOUGH O'SULLIVAN

DIRECTORS:
BRENDAN BUTLER
BRIAN CALLANAN
MARIA CRONIN
CIARAN FITZGERALD
BRIAN GEOGHEGAN
JACKIE HARRISON
BRENDAN McGINTY
DON O'HIGGINS

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Council for the West
Comhairle don Iarthar

Rec. 25625
€20 cash
27/1/04

Planning office,
Mayo County Council,
Castlebar,
Co. Mayo.

03/3343

Ref: Corrib Gas Project PO3/3343

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A Cara,

I wish on behalf of the Council for the West to make the enclosed submission on the Corrib Gas planning application. I enclose €20 fee.

Thanking you,
Yours sincerely,

Sean Hannick
Chairman.

Council for the West, Unit 13, Business Centre, Market Yard, Sligo. Tel: 071 46966 Fax: 071 46960 E-mail: cftwest@iol.ic
t/a Developing the West Together Limited. Registered No. 197197

Members: Sean Hannick - Chairman, Declan O'Callaghan - Vice-Chairman, Paddy Berwick - Treasurer, Michael McGarrigle - Secretary, Stephen Finn – PRO, John Connolly, Most Rev Bishop Thomas Finnegan, Most Rev Bishop John Flemming, Tom Garvey, Marian Harkin, Most Rev Bishop Christy Jones, Michael Kelly, Rev Thomas Keogan, , Rev Seamus McKeon, Ray O'Donaghue
Patrons: Most Rev Bishop Philip Boyce, Most Rev Bishop Thomas Flynn, The Right Rev C A Henderson, Most Rev Bishop John Kirby, Most Rev Bishop James McLoughlin. Most Rev Archbishop Michael Neary. Most Rev Bishop Colm O'Reilly. Most Rev Bishop Leo O'Reilly

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Council for the West
Comhairle don Iarthar

Submission by Council for the West

to

Mayo County Council re Corrib Gas

P03/3343

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January 2004

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Introduction

The Council for the West submission to Mayo County Council supports the granting of planning permission for the Corrib Gas project proposed for Bellanaboy Bridge, Co Mayo.

Background

The Council for the West is an organisation of voluntary non-remunerated persons comprising of representatives from the main churches, businesses and community groups throughout the six counties of Donegal, Sligo, Leitrim, Roscommon, Mayo and Galway.

Its aims are:

- To mobilise communities and support their participation in the local and regional development process.
- To influence policymaking and have a significant input into planning for rural areas. The aim is that equal opportunities will exist for every person to live in a rural or an urban area.
- To highlight the social and economic disparities in the region
- To co-operate with local agencies and facilitate, where possible, job creation projects to improve the quality of life of those working and living in rural areas.
- To promote rural regeneration taking particular account of the role of agriculture and natural resources.

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As part of our role in influencing national and regional policy and promoting balanced regional development the Council for the West has been involved in the following:

National Spatial Strategy – As a nominated organisation, the Council for the West during the two year consultation period made a detailed submission to the Spatial Planning Unit following numerous meetings with officials and other interest groups. The Council for the West will be represented on the North West subgroup of the Border Regional Authority on regional planning guidelines.

The National Rural Development Forum – the Council for the West is a member of this forum which meets twice a year to discuss rural development issues.

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West Infrastructure Now (WIN) Campaign – This campaign was initiated in Dec 2001 to highlight the infrastructural deficits in the region as outlined by the Western Development Commissions "State of the West Report" and to encourage local groups/communities to support the provision of the infrastructure.

The 2003 Mid Term Review of the NDP provides an important opportunity for the re-prioritising of projects for the final years of the NDP to 2006. The Council for the West has met with relevant Departments to prioritise investment in this region and ensure a fairer share of national expenditure is spent on infrastructure.



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Enterprise Strategy Group – The Council for the West made a submission and subsequent presentation to this group in January 2004. The purpose of this group is to review Ireland's enterprise strategy in the context of the opportunities and challenges likely to arise over the next 10 years.

Other recent submissions on regional policy include:

- Border Regional Authority on Regional Planning Guidelines
- Oireacthas Committee on European Affairs

The Importance of Corrib Gas for this region

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In the context of meeting its objectives outlined earlier the Council for the West believe that planning permission should be granted for the Corrib Gas project.

Natural gas can provide an efficient and clean energy source and its importance as a potential driver for social and economic development in this region cannot be underestimated.

The Council for the West over the last number of years has campaigned to ensure that the infrastructure in this region is of a standard to create the conditions for industrial competitiveness, job creation and inward investment.

In this context, the availability of natural gas in this region will provide the energy infrastructure necessary to attract inward investment but also sustain existing industry and businesses and also supply domestic consumers.

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The Western Region until now had had no gas supply something other regions take for granted and we believe that the granting of permission for this project is in line with the Council for the West regional policy[1] and the Government stated objective of balanced regional development.

Agencies and Departments with similar policies and objectives are:

- **The BMW Assembly**[2] "believes that the case for extending the Corrib gas pipeline to further towns in the region is very strong and should be supported by Government".

- **The Western Development Commission**[3] has argued that natural gas is an essential infrastructure and that it is necessary to expand the network in the region to enable it to compete with other parts of the country that already have access to natural gas. It has also pointed out that the route of any pipeline should be such as to maximise the number of towns with access.

- **Mayo County Council**[4] "fully supports the realisation of the Corrib Gas Field find" and it fully conforms to the new Mayo County Development Plan 2003 – 2009.

- **The Department of Communicatons, Marine and Natural Resources**[5] objective in ensuring that the energy sector contributes fully to the Governments objectives in promoting regional development and enhancing social inclusion "it has been decided in principle that the network should be extended to Sligo via Ballina from the proposed Mayo/Galway pipeline"

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[1] Regional Development – Policy Proposals – Council for the West – Jan '02
[2] BMW Submission on Balanced Regional Development in the BMW Region – March '03
[3] WDC Jobs for towns – footnote 26 – December 2003
[4] Mayo County Development Plan 2003 - 2009
[5] Department Communications, Marine & Natural Resources – Annual Report 2002

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The Council for the West Energy Committee – background

In 2000 the Council for the West expressed concern that the Government position on the distribution of natural gas from the Corrib Gas field was to Galway with no commitment to bring the gas north wards.

Conscious of this and that the needs of this region were being overlooked, the Council for the West organised a conference in Knock in October 2000 to focus attention on the justified case for natural gas from the Corrib Gas Field to be made available throughout the West and North West.

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Out of that meeting an Energy Committee of the Council for the West was formed with representation from all parts of Connacht and Donegal. This committee's task was to press for natural gas to be provided throughout the region and in doing so to take cognisance of the rights and requirements of people and communities affected by the landing and construction infrastructure involved - in ensuring that the adverse impacts on the environment and people in the landfall area was minimised.

In February 2001, the Council for the West welcomed Minister Joe Jacob's announcement to bring gas to Ballina and Sligo, however, we believe that the gas should be piped strategically throughout Connacht and available to other towns in the region.

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We believe that the landing of gas in North Mayo is crucial to this region if towns like Ballina and Sligo are to have access to natural gas supply, it is unlikely that these towns will be serviced by the gas network unless it is landed there.

Conclusion

The Council for the West believe that the granting of permission for the Corrib Gas project will allow this region access to natural gas and the much needed opportunity to achieve its investment and development potential and compete with other regions that already have access to natural gas.

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Leenamore,
Pullathomas,
Ballina
Co. Mayo

Pw 65629
€ 20 cash
27/1/04

7th January 2004

The Planning Office,
Mayo County Council,
County Buildings,
Castlebar

03/3343

Re:- Planning Application for Gas Terminal at Bellagelly South and the transportation of peat for deposit at Shrahmore

Dear Sir,

We wish to object to the above Planning Application.

At the outset, we wish to state that we are absolutely astounded by the proposals in this application.

The facts relating to this case are –

- A Planning Inspector of An Bórd Pleanála sat for weeks on the previous application on this site, listened to all the submissions made by a plethora of experts, analysed all the pertinent facts, and then in his report totally agreed with the salient points made by the objectors

- In recent months we have had numerous landslides in the vicinity; landslides that are likely to continue. The destruction, chaos and fear that they have caused are overwhelming; anything that may trigger a similar disaster in the vicinity shouldn't be contemplated.

- The analogy of the Derrybrien Bog disaster, so graphically displayed by the media, of similar terrain to the subject site, shows how totally unsuitable sites of this kind are for major developments.
  It also confirms how soundly based were the report of the Planning Inspector and the decision of An Bórd Pleanála in the previous application for this site

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- This application raises Major issues - Health, Safety, Contamination of our waters, Security, Fear, Pollution, Destruction of our basic infrastructure, Destruction of a pristine environment etc.etc.

This application is not in line with the proper planning and development for such an environmentally sensitive and scenic area.

The excavation of a hill site and the transportation of the bog C. 11 Kms defies common sense - it is bizarre

I enclose the requisite fee - €20

Please acknowledge receipt of this objection

Yours sincerely, John Mc Andrew, Mrs Ellen Mc Andrew.

Leenamore/Ballinaboy Concerned citizens

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Pl: 6406
€20 cl
27/1/04

Elly,
Clogher,
Belmullet,
Co.Mayo.

February 27, 2004

Mayo Co. Co. Planning Authority
Aras an chontae,
The Mall,
Castlebar.

Reference: P03/3343

Dear Sir or Madam:

I am making an observation on 'Shell E&P Ireland Limited' application for planning permission for proposed gas terminal at Bellagelly south.

The following points need to be addressed:

1. **Position of outfall pipe.**
2. **Position of landfall pipe and route high-pressure pipeline to proposed terminal.**
3. **Lack of information and failure to address these matters in the Application.**

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Under the Seveso II Directive [96/82/EC], and its amendment, Brussels, 10.12.2001 COM(2001) 624 final, 2001/0257 (COD). According to the definition contained in Article 3, N° 1 of the Directive; States:

'establishment' shall mean the whole area under the control of an operator where dangerous substances are present in one or more installations, including common or related infrastructures or activities..

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1. **Position of outfall pipe.**

A scientific survey on marine mammals in Broadhaven bay and surrounding waters was carried out by CMRC (coastal and marine resource center, Cork) in 2001/2002. This study was commissioned by Shell, and the results of which have been in their possession for over 9 months. They have failed to acknowledge this in their EIS and act upon it in their current application. The results of the survey show that Broadhaven bay may be one of the most significant bays, biologically, in Ireland. Over 220 sightings of marine mammals were recorded, 10 species, being:

Cetaceans:

- Bottlenose Dolphin
- Risso Dolphin
- Whitesided Dolphin
- White beaked Dolphin
- Common Dolphin
- Harbor porpoise
- Minke Whale

Seals:

- Grey seal
- Harbor/Common seal

Otters:

- European otters.

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The information on this report has not been made available to Mayo Co.Co. in this application. With so many recorded sightings of protected marine mammals in the vicinity of the outfall pipe, I feel that the MLVC (Marine license vetting committee) should review the current marine license and determine if this license is in fact valid in light of this new scientific information. The position of the outfall pipe was determined before the information was made available to the MVLC, it is crucial that this position be reviewed in the interest of conservation and protection of the abundant marine life within the bay. The sightings of Sunfish were logged within the bay on ebbing tides, these fish use ocean currents as their form of propulsion, and this contradicts the ocean current model supplied by the applicant in their previous marine license application. This would indicated that any effluent or heavy metals discharged would stay within the bay and move southwards towards Blacksod bay in due time. Blacksod bay is also a marine SAC and is used for recreation by many local children in the tidal pool, shore road and uisce water sports center in Elly bay.

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2. **Position of landfall pipe and route of high-pressure pipeline to proposed terminal.**

The position of the landfall site was determined before the recent landslide on Duncarton hill. The ground in the vicinity of the landfall and the first crossing of the bay to Rossport has been disturbed and pitted; there is video evidence of this. In the EIS the applicant states that a pipeline of this nature is not capable of withstanding much ground movement. This pipeline is also in the proximity of two local schools and within meters of residential housing. It is obvious that this area cannot seriously be considered as a safe route for a highly explosive, high-pressure gas pipeline. Should the pipeline burst in the event of a further landslide, accessibility to the damaged pipeline would be cut off, as would controls to the source, which run side by side with the main high-pressure pipeline, the results would be catastrophic.

3. **Lack of information and failure to address these matters in the Application.**

The applicant has failed to address both of these very serious issues and also failed to provide any significant information that would prove that;

1. This is a suitable safe site for a gas terminal.
2. That this is a safe route for a high-pressure gas pipeline.
3. That this is a best position for an effluent discharge pipeline.

The applicant has yet again failed to investigate properly, alternative sites for this proposed development.

Failure by the applicant to address such serious issues as noted above and their persistence to route a highly explosive, high-pressure pipeline in ground that is prone to major movement and slippage, shows the respect they have for the safety of the local people and environment.

Should an application so flawed gain approval from the planning authority, I have no doubt that European intervention will be sought.

Sincerely,
Anthony Irwin

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INNEALTÓIRÍ CUMHACHTA

SIGNED

January 24, 2004

Attention: PLANNING SECTION

Mayo County Council
Aras an Chontae
The Mall
Castlebar
Co Mayo

Rec 6419
€20 28/1/04.

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Dear Sirs,

Corrib Gas Treatment Plant Planning Application No P03/3343

We understand that you are currently considering the above application. We would therefore like to draw your attention to the significance of the gas treatment plant and the delivery of the Corrib gas to north Mayo, for the prospects of a new gas-fired power plant at Bellacorick.

In May, 2002 we commenced discussions with various local parties, including the Planning Section of Mayo County Council, in regard to the possible construction of a gas-fired power station which would utilize the existing 110kv substation. This currently serves the ESB peat-fired power station. A 330 page Environmental Impact Statement was prepared and Planning Approvals were subsequently issued by the council. (P01/1249 P01/1250). The Planning Approvals for the power station were granted without objections or appeals. A copy of the "Clean and Green" leaflet used to describe the Bellacorick Power Plant project is enclosed.

Innealtoiri Cumhachta Teoranta, Company No. 6366902N
VAT No. IE6366902N
Muingmore, Bunnahowen, Bangor
Ballina, Co, Mayo • Republic of Ireland
A member of the POWER Engineers, Inc., group of companies
Directors: John Cavanaugh (USA); David Gardner (UK); Jack Hand (USA)
Tel + 353 (0) 97 86933
Fax + 353 (0) 97 86932

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INNEALTÓIRÍ CUMHACHTA

The Planning Approvals are for a high efficiency power plant, with low environmental emissions, which would provide a secure electrical supply of 70mw, which is equivalent to the needs of consumers across County Mayo. Because of its high efficiency and use of natural gas, it would provide electricity to the Irish systems with low greenhouse emissions. The Power Plant would provide up to 130 jobs during construction, followed by high-quality employment for 15 for at least 20 years of operation. The Power Plant would reduce the risk of loss of electricity supply in Mayo due to transmission failures.

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As may be seen from the Environmental Impact Statement submitted with the Planning Application, the environmental emissions of the 70mw power plant and its visual impact, will be substantially lower than current 40mw peat-fired power station. While the new gas-fired power plant will have an excellent environmental performance, and provide good long-term career employment and enhance electricity supply in County Mayo, it would require a gas supply.

We would wish to suggest that the considerable economic and environmental advantages of the gas-fired power plant at Bellacorick are considered when the application for the gas treatment plant is being received.

Sincerely,

David Gardner

Innealtoiri Cumhachta Teoranta, Company No. 6366902N
VAT No. IE6366902N
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A member of the POWER Engineers, Inc., group of companies
Directors: John Cavanaugh (USA): David Gardner (UK): Jack Hand (USA)

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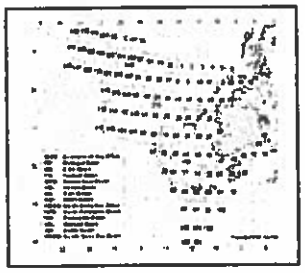
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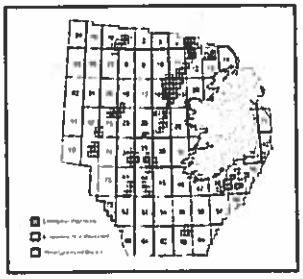
THE BRIAN COYLE OBSERVATION & OBJECTION REPORT

SCANNED









By Brian Coyle,
BE, CEng, MIEI, MIStructE

Chartered Consulting
Civil & Structural Engineer

Principal of
COYLE KENNEDY LTD
Consulting Engineers

TO THE SITE CHOSEN FOR CORRIB GAS TERMINAL
THE PROPOSED CONSTRUCTION TECHNIQUES & ROUTES
THE PEAT DEPOSITION SITE AT SRAHMORE
THE UPSTREAM HIGH PRESSURE PIPELINE ROUTE

6378
€20 cash
26/1/04

BASED ON ITS WORLD RECORDS

Should we allow the Corrib Gas Field to be Connected:

- To an Inland Terminal

And

- Become the only Inland Terminal In the WORLD?
- Surrounded in BLANKET BOG that can become unstable at an angle of 2degrees or more
- Connected from a Landfall at the Base of a Hill that is Unstable
- Residents as close as 60m to the High Pressure Untreated Pipeline
- Residents within the Explosion/Gas Vapour Exclusion Zone from the Terminal and High Pressure Pipeline
- Streams and Rivers within an exclusion zone feeding into a major drinking water supply
- The only World Wide Deposition of 450,000m3 of Acidic Blanket Bog
- Causing in excess of 100,000 traffic turning movements during its development
- Resulting in the removal and discharge of at least 400,000,000 litres (Four hundred million) litres of acidic base water to the North and South of Carrowmore Lake, the only drinking water supply for the entire region
- In an Area of Natural Ground Instability

Why should we?
- when all the other World Wide Authorities have done different

As We Are Lead To believe by the Applicant That There Are No Other Alternatives! When in fact there are!

Is it the lack of experience in our Representatives and Authorities that they do not know the difference between right and wrong?

We do not want an Emis EU Directive to be written similar to the Seveso II directive that was written following the disaster and the ultimate consequence to people in the small town called Seveso in Italy.

The Content of this report is written without prejudice

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Appendices

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See Next page for Appendices

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Observer and Objector

The observations and objections contained in this document are compiled and written by Brian Coyle BE, CEng, MIEI, MIStructE Chartered Consulting Engineer and are the observations and objections of many of my immediate family and friends that reside throughout the Erris community. These observations and objections are contained within the full text of this document and are supported with references from the applicant's application.

Proposed Development Planning Text

Bellagelly South & Srahmore Attavally Proposed Development.

PLANNING REFERENCE NO 033343

LOCATION BELLAGELLY SOUTH
SRAHMORE ATTAVALLY

PERMISSION SOUGHT FOR
CONSTRUCT GAS TERMINAL FOR THE RECEPTION AND SERAPATION OF GAS FROM THE CORRIB GAS FIELD, AND FOR A PEAT DEPOSITION SITE, RESPECTIVELY. THE DEVELOPMENT WILL CONSIST OF THE CONCURRENT DEVELOPMENT OF TWO SITES LOCATED 11 KILOMETRES APART, APPROXIMATELY, AND IDENTIFIED AS THE SITE OF THE GAS TERMINAL FOR THE RECEPTION AND SEPARATION OF GAS FROM THE CORRIB GAS FIELD IN THE TOWNLAND OF BELLAGELLY SOUTH AND THE SITE OF THE PEAT DEPOSITION SITE IN THE TOWNLANDS OF SRAHMORE AND ATTAVALLY, BANGOR ERRIS. THE DEVELOPMENT AT THE BELLAGELLY SOUTH SITE WILL CONSIST OF: A GAS TERMINAL FOR THE RECEPTION AND SEPARATION OF GAS INCLUDING PLANT AND EQUIPMENT; PROVISION OF 4,935 SQ M (GROSS FLOOR AREA), APPROXIMATELY, OF BUILDINGS; ACCESS ROADS; 40 NO. CAR PARKING SPACES; AND ANCILLARY DEVELOPMENTS, OF WHICH 13 HA, APPROX, WILL BE DEVELOPED INRESPECT OF THE GAS TERMINAL'S FOOTPRINT. THE PROPOSED DEV. WILL OF THE BELLAGELLY SOUTH SITE WILL ALSO CONSIST OF; THE EXCAVATION AND REMOVAL OF 450,000 CUBIC M

Summary of Observations and Objections

I Object to the Proposed Site for the Gas Terminal Industrial Process at Bellagelly South, located to the North of the Catchment area of Carrowmore Lake, on the following basis.

- Health and Safety Risks that this development impacts to local residents. Engineering assessment on slope stability must examine slope stability prior to, during and after an explosion and also take account of Natural and livelihood events that are outside the applicant's control. The applicant has identified these events as one of the reasons for peat/land slides on slopes as low as 2 degrees but has not provided an engineering assessment, or a method of control for such events.

- Health and Safety Risks that this development impacts to Carrowmore Lake and hence the Erris community during construction, following construction or after an explosion. The applicant fails to identify how they can limit the consequences of events identified by them and in the Seveso II directive. The applicant has no control on the land use or the surface water runoff to streams and rivers that feed into Carrowmore Lake. These streams and rivers are outside the control of the applicant and can become contaminated with toxic chemicals.

- I object to the risk that the terminal imposes on the stability of the surrounding landscape including Dooncartoon Hill. The risks associated with the Gas Industry process i.e. explosions etc. will cause ground vibrations and hence ground instability. Remember that the applicant has identified in their submission that peat can become unstable at an angle of 2degrees or above.

- I object that economic analysis based purely on the Corrib gas quantity has formed the immediate basis of their decision for building an inland/onshore gas terminal. Gas/oil Hydrocarbons have been found and exploited in the Celtic Sea, the Porcupine Trough and in the Corrib Basin. These areas are mainly located off the west coast of Mayo, Galway, Clare and Kerry.

- I object to the excavation and the deposition of 450,000m^3 of Acidic Peat to the South of Carrowmore Lake (the only drinking water supply for the entire Erris People).

- I object to the increase in traffic turning movements associated with this proposed development and the impact that this has on local residents, emergency vehicles etc.

- The previous application identified approximately 7,600 traffic-turning movements. The current application will introduce A MINIMUM OF 82,000 TRAFFIC TURNING MOVEMENTS just to remove the Acidic Peat. The overall traffic turning movements associated with the proposed development will exceed 100,000 movements i.e. a truck will enter or

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leave the site at least 100,000 times during construction.

- At least 90% of peat is water. There is 1000L of water in a meter cube (m^3). I object to the removal of such a large volume of acidic water contained in the Blanket Peat. This blanket peat is going to be disturbed/removed and disposed in an area to the North and South of Carrowmore Lake respectively.

  The amount of acidic water contained in the blanket bog is AT LEAST 405,000,000 LITRES (FOUR HUNDRED AND FIVE MILLION LITRES OF ACIDIC WATER).

- I object to the traffic hazard imposed on local roads arising from the construction of the terminal, the removal of 450,000m^3 of peat and 50,000m^3 of mineral soil. The c.11km route chosen to dispose this material is inadequate in formation, width and alignment. This road will be destroyed and congested with trucks during construction and will impose a high risk to those people travelling to Castlebar General Hospital in the event of an emergency. This route is the shortest route available to Castlebar General Hospital for all residents in the North Erris area. Therefore, people's lives are at risk even during construction stage.

- I object to the location of the Gas Pipeline, Discharge Pipeline and Umbilical Line as identified under the Foreshore Licence. I also object to the Link between this infrastructure and the Gas Terminal on foot of the recent landslide of Dooncartoon Hill. The pipeline is also been laid on Blanket Bog which the Applicant has identified can slide at an angle of 2degrees or more. How do they intend to control Natural or Local livelihood events that have been identified (by the applicant) as one of the main reasons for peat/land slides? These landslides will undoubtedly fracture, shear the pipeline and can impact on the terminal and cause a catastrophic disaster in an area currently stamped with natural ground instability. In light of this new information the Minister for the Marine has power under the Foreshore Act to withdraw the Foreshore licence on the basis of non-observance by the licensee of all these events at the time the licence was issued.

- I object to the fact that insufficient Health and Safety assessment has not been provided for all the above events and their ultimate consequences. All Health and Safety aspects should be assessed at this stage. How do we intend to control and limit the consequences of these events if people involved cannot even provide a solution at this stage? It is unacceptable to conceal facts and realistic concerns associated with the proposed development.

LET US BE AN EFFECTIVE AND RESPONSIBLE NATION FOR ALL OUR ACTIONS

At the very least, if an onshore site is required then it should be:

- Outside the catchment of a major drinking water supply thus reducing the consequences of a Seveso II event.
- In an area with surrounding ground stability, where such large quantities of Peat should not have to be removed thus reducing a traffic hazard, acidic peat removal and 400 million litres of acidic water.
- Where most of the raw materials can be quarried on site for hardcore fill and concrete etc.
- In situations like this, the Health and Safety of livelihoods should take precedence over areas of special conservation and areas of scenic amenity. There are many other sites available in Erris and indeed in Mayo, where the high risk events and the potential consequences of a gas terminal is dramatically reduced.

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Introduction

Ireland has one of the largest Offshore Oil and Gas exploration areas in Europe. Hydrocarbons have been found and exploited in the Celtic Sea, the Porcupine Trough and in the Corrib Basin. Refer to Appendix A for location of these areas. They are predominantly off the coasts of Counties Donegal, Sligo, Mayo, Galway, Clare and Kerry.

Elsewhere throughout the world Gas processing is carried out either at newly constructed Gas terminals or connected into existing gas infrastructure. The existing European Gas network infrastructure currently available is capable of delivering the Corrib gas to Africa and Russia.
Refer to Appendix "A" for the existing European Gas Network layout infrastructure.

The basis of my objection is outlined below and is supported with extracts and statements from the applicant's submission.

Facts and Figures

Gas is been extracted in water depths greater than 1000m. The Corrib gas water depth is approx. 200m
e.g. NANSEN BOOMVANG GAS FIELD is extracted from waters greater than 1000m deep.

Existing techniques exist for the transportation of untreated Gas from a well to a terminal either offshore or onshore for up to distances of 140m. This transportation distance is currently been quoted for SNØHVIT GAS FIELD, BARENTS SEA, NORWAY where a much more harsh marine environment exists than that in the Corrib field. Therefore, onshore sites can be considered in Counties Sligo, Mayo, Galway and Clare for an onshore/coastal terminal for the Corrib Gas Field.

Of all the gas terminals in the world none of them are inland.

At the hearing arising from the previous application it was determined with some difficulty that there would be 7,600 truck movements arising from the development. Truck turning movements arising from this recent application will now exceed 100,000 movements.

It is proposed to remove 450,000m^3 of Peat off-site. This is saturated blanket bog with approx. 90% moisture content. This cannot be compared to volumes of dried powder such as peat commonly transported by Bord Na Mona.

There is no evidence available to suggest that such a large volume of blanket bog has ever been satisfactorily excavated and/or satisfactorily deposited so close to a major drinking water supply without contaminating it.

At least four hundred and five million litres of acidic water (405,000,000L) is contained within this peat and has the potential to seriously pollute the only water supply for the entire region.

Gas and Oil pipelines fracture and burst throughout the world on a daily basis.

The safety aspect of the high pressure pipeline has not been properly reviewed.

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Economic analysis based purely on the Corrib gas quantity is misleading.

Corrib gas quantity should not form the immediate basis of the applicant's decision to choose an inland terminal.

I object to the fact that economic analysis based purely on the Corrib gas quantity has formed the immediate basis of the decision for building an inland/onshore gas terminal. Inland and Onshore gas terminal will allow the applicant to expand for their own benefit.

The applicant has failed to provide in-depth site-specific information for the alternative sites investigated. The applicant has ruled against these sites on their own merits. A proper and site-specific documented list as previously requested by Bord Pleanala should be provided and examined by the local Authority in conjunction with the HSA and made available to the public for comparison purposes.

Based on the unexplored but already licensed exploration blocks in the Atlantic Ocean it is only a matter of time until the applicant will offer, use or share this proposed development infrastructure to process and export future oil/gas findings. The exploration licensed block areas are clearly shown on maps included in Appendix A.

The applicant has previously identified that the terminal has been designed to be the control centre for all the offshore (subsea) facilities in the Corrib Field and beyond. Refer to Page 14 of 377; An Bord Pleanala Report under the heading 'Design Life' for the recorded information.

The Applicant States in Section 4 "Alternatives" Subsection 4.2.2 "Reasons why alternative concepts were eliminated:"

> *"Economic analyses determined that the very high capital and operating cost of each of the floating or fixed platform options, combined with the requirement for extensive gas transport infrastructure, could not be recovered due to the relatively moderate size of the predicted Corrib reserves and envisaged gas sale price."*

This statement and the applicants decisions based upon this statement are misleading and inaccurate for the following reasons:

- The applicant bases their economic decision purely on the quantities of the Corrib Gas field and for the applicant's own economic benefits.
- Under the current legislation, the HSA should also examine, qualify and prepare a HSA Zoning for each site and participate in choosing the appropriate site.
- Offshore and Coastal Platforms have previously been built for such quantities and recent exploration findings use the previously constructed offshore/coastal platforms for a terminal connection (e.g. Canyon Express).
- The areas explored off the West Coast of Ireland is very small and already gas/oil findings have been made. Economic analysis based purely on the Corrib gas quantity should not form the immediate basis of the decision to build an inland gas terminal. Refer to Appendix A for other Licensed Blocks areas.
- The quantities of gas/oil in Irish Waters off the west coast of Ireland are likely to be greater than Corrib gas find.
- It was previously identified that metocean conditions in the North Sea, where offshore platforms are common, greatly exceed the average metocean conditions for Corrib field. Metocean conditions at Corrib suit an Offshore Platform.
- Economics for the benefit of a Multinational company should not be the deciding factor.
- Previous submissions to An Bord Pleanala by one of the applicant's agents from Granherne stated at the hearing that it is technically feasible to develop Corrib in a different way.

Incorrect Assessment of Alternative Sites

The applicant has ruled against alternative sites on their own merits. It is obvious once again from reading the current application that Economic Analysis on the applicants' part seems to be the main deciding factor in choosing the proposed site which is the only inland gas terminal site in the world. Under the current Planning and Development Act, the local authority including the HSA should be determining the Land Use Policies for an area especially an Industrial Area.

Mr. Kevin Moore of An Bord Pleanala previously stated on Page 74 of his report dated April 2003:

> *"that the landfall options in the Killala area were dismissed because (a) the location considered*

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suitable in the Bay was a designated Special Area of Conservation and Natural Heritage Area and (b) the best landfall locations to the west of the Bay are designated as being of Special Scenic Importance.

I wish to highlight that the landfall location at Dooncarton for the proposed Corrib Field development is a proposed Candidate Special Area of Conservation. It is also a designated Area of Special Scenic Importance. Sruwaddacon Bay, through which the pipeline from landfall to terminal would go, is a Special Protection Area and a proposed Candidate Special Area of Conservation. Beaches on both sides of this Bay are designated Areas of Special Recreational Importance. The pipeline would also traverse Glenamoy Bog Complex, a Special Area of Conservation."

P75 & P76

The criteria used to determine a suitable route for the pipeline from landfall to terminal have been seriously breached in my opinion.

It is apparent that the development concept that has been decided upon has limited the serious consideration of alternative landfall locations, restricting landfall to the Dooncarton area in general. Following on from this, the selection of the terminal site some 8km inland has created a very limited spatial corridor through which a pipeline would have the ability to traverse. This narrow assessment of alternatives is seriously deficient in my view. Once again, I would stress the importance for the Board to give serious consideration to each of the alternatives to onshore processing as each alternative concept clearly determines the type of facility which would be developed onshore and, obviously, the potential routing of a raw gas pipeline, if any, from landfall to terminal site.

In conclusion, I would draw the attention of the Board to a response by Mr. Taylor in cross-examination by me at the Oral Hearing when asked is the crossing of an untreated gas pipeline, umbilical system and discharge pipe through a terrestrial corridor of 8km or more unprecedented. He submitted that it is the only one of a kind that he is aware of.

Mr. Moore states that;
It is my submission to the Board that:

- *From a strategic planning perspective, this is the wrong site;*
- *From the perspective of Government policy which seeks to foster balanced regional development, this is the wrong site;*
- *From the perspective of minimising environmental impact, this is the wrong site; and consequently*

From the perspective of sustainable development, this is the wrong site.

Coupled with all of the above is:

- the recent Dooncarton Hill landslide
- a new location for the peat
- additional 82,000 truck movements
- and 405,000,000 litres of acidic water contained in the peat.

Therefore, the impact of the proposed development has got larger.

The applicant has failed to demonstrate and/or confirm the stability of Dooncartoon Hill either before or after an explosion (an event that the applicant agrees is possible) arising from the offshore pipework or the landfall to gas terminal pipework or from the terminal itself.

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Traffic Hazard

At least 82,000 more truck journeys introduced to the public roads compared to the last application.

This proposed development is introducing a further 82,000 truck journeys to the public roads.

Refer to Page 267 or 377 of the An Bord Pleanala Inspector Report based on the previous application.

It was concluded that

"there would be at least 17,374 two-way HGV trips" associated with the construction works arising from the previous application and the Planners comments based on these numbers were;

"There would be a vast increase in the volume of heavy vehicles using this poor public road network during the construction phase. The adverse implications of the extensive volumes of HGV traffic would be compounded by the range of abnormal loads, which would relate to the development of the terminal on the platform. The destruction of these public roads, the need for ongoing maintenance of these roads, the consequent need to utilise local roads in the event of regional road repairs, the inevitable necessity to reinstate the haul roads, and the constant obstruction to existing road users would be intolerable."

It was previously proposed to store the peat on site in the previous application, now it is proposed to remove the peat to the Srahmore Site.

The volume of Peat to be removed is approximately 450,000m^3, this does not include any peat removal along the pipeline route. There is no evidence to show that such a large quantity of peat has ever been successfully excavated and deposited like this before.

It is also proposed by the applicant to limit the carrying capacity of the truck to eleven tonnes (11t)

The density of Peat varies from approx. 800kg/m3 to approx 1200kg/m3.
Assuming an average bulk density of peat to be 1000kg/m3 i.e. a cubic meter of peat will have an average mass of One Tonne (1t).

11tonne equates to a volume of 11m3.

Therefore;

450,000/11 = 40,909

Therefore, it will take almost 41,000 truck journeys (one-way) to complete the peat removal. It is almost unbelievable to think that a truck will have to visit the site at least 82,000 times just to complete the Acidic Peat removal alone and deposit it on the other side of Carrowmore Lake.

The 82,000 truck journeys including traffic turning movements do not include the importation of hardcore, concrete, steel etc. required for the construction stage.

This volume of traffic combined with previous estimates for the construction phase of the project suggests that there would be at least 100,000 HGV movements associated with this development.

The proposed development will overwhelmingly increase traffic movements compared to the last application. This will introduce a major traffic hazard especially during construction. The public roads will be damaged and congested on a daily basis during the course of the project.

The intensity of traffic along a specific route, where the route in substandard in width and alignment, will congest the local public roads and will undoubtedly produce a traffic hazard for all local users.

This congestion will delay/prevent vehicles from getting to a destination on time especially in the event of an emergency (medical, fire, labour etc.). Therefore, people's lives are at risk.

Increasing the HGV movements of the development from 17,374 to at least 100,000 has now further reinforced the planners concerns. These numbers do not include car trips to and from the site, which was previously estimated to be 262 trips during Peak hours i.e. 524 trips per day for the duration of the project.

I would suggest that a site be chosen where peat is limited, where there are sound foundations and where the raw materials for the development can be quarried on site. This would dramatically reduce the HGV movements to less than 4000.

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Control of Ground Movement and Slope Stability has not been Fully Assessed.

The applicant has failed to consider Ground Movement and Slope Stability following Man Interference, Natural or Explosion Events. They only consider ground static stability.

The applicant states in Section 4.5.1 of the EIS report;

"*that **minimal** differential movement of the ground **is essential** because*

- *for safety and operability, particularly for equipment operating under high pressure, piping and equipment require very tight tolerances on differential settlement.*
- *Piperacks, **piping** and equipment design and installation would be very complex in a plant subject to differential settlement.*
- *excessive settlement would create operability difficulties for equipment such as pumps, turbines and compressors*

The applicant has admitted in Section 8 Soils, Geology and Hydology Subsection 8.4 Potential Impacts that:

*" its not unusual for **Bog failures** with man interference have occurred on slopes as shallow **as 2 degrees**. Both **natural** and **man-made** drainage measures have also often been identified as a contributory cause of some failures. The use of **trackways** across peat land can also impose additional loads, which could contribute to slope failures."*

The applicant has only considered the ground stability outside the site under its current use and status, and this is not enough.

They fail to realise that the applicant has no control of the land use outside their boundaries. Bog failures with man interference, trackways and drainage can occur outside the site boundaries thus destabilising the surrounding ground that ultimately can impact on the proposed terminal building.

Therefore, the entire peat land surrounding the site should be in the control of the applicant so that human interference, trackways and drainage cannot occur.

The proposed pipeline is laid in vast quantities of surrounding peat. These ground instability problems as identified by the applicant design team, i.e. destabilising peat at slopes as little as 2 degrees can also occur along the pipeline, where there is vast volumes of peat at much large slopes. Such failures will rupture the pipeline; will cause pollution and more than likely explode thus affecting the entire community.

The applicant should be in full control of all slopes and all activities that can ultimately impact the terminal and pipeline.

Also, the above extract taken from the applicants submission has also identified that peat slopes have failed at angles as little as 2 degrees arising from natural events.

The applicant submission has identified a well-known engineering scenario that cannot be controlled - natural ground slope instability.

The applicant has no control of natural events and therefore the surrounding sloping ground can become unstable thus impacting the terminal and/or pipeline. These events have occurred in this area as recent as September 2003.

It is therefore not surprising, that the applicant has requested a flat level site for the benefit of fire fighting. The applicant acknowledges in Section 4 "Alternatives" subsection 4.5.1 of the EIS report that fires are possible and hence explosions can occur, when they state that one of the reasons for a flat site is

" to facilitate fire fighting around storage tanks."

The consequences of fires around highly flammable and explosive substances and the cascade affects to surrounding landscape, residential and public areas are inconceivable. The applicant has failed to identify control measures and the environmental consequences of such events.

The applicant has failed to examine and/or provide control measures for the stability of the surrounding landscape (including Dooncartoon Hill) following an explosion at the terminal or along the pipeline. Peat slopes can become unstable at angles of 2 degrees or greater. The surrounding landscape contains peat at angles much greater than two degrees.

Therefore, this development with its associated High Risk events can cause surrounding ground instability thus more landslides etc.

Failure of structures and fractures in pipelines arising from differential or natural ground movement, is one the main modes of civil and structural failure and it's not surprising that this is one of the biggest insurance claim areas.

I object to the proposed site as it is located in an area surrounded with natural ground instability, contains blanket bog at angles greater that 2 degrees, with current and future land use outside the control of the applicant.

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Land use together with natural ground movement/instability can ultimately have an impact on the terminal and visa versa i.e. the terminal events can have an impact on the surrounding landscape in terms of slope stability after an explosion.

Shortcomings in the Applicant's Investigation

Considerations were given to a Gas Terminal close to the landfall at Dooncartoon Hill.

The shortcoming in the applicant's investigation into natural ground movement is a matter of great concern. It is somewhat disturbing to realise that the applicant even considered the construction of the terminal and the installation of the high-pressure pipeline at the foot of Dooncarton Hill (where the landslide occurred in September 2003).

This is evident in section 4.4.4 of the current EIS report when it states:

> *"..that a terminal location near the landfall was considered. This site was located to the South West of Pollathomish at the bottom of the hill. Given the scenic nature of the area and the conservation status of the bay, this location was discounted as it was considered that the terminal would be intrusive".*

It is obvious from this statement that the only reasons why this site was discounted was because the terminal would be intrusive within an area of scenic natural beauty and the conservation status of the bay. The stability of Dooncartoon Hill was not considered.

Specialists recently employed by Mayo County Council have already voiced the possible reoccurrence of the landslide of Dooncarton Hill.

How can the applicants now conclude that the landfall location and route for this pipeline is safe when it was concluded only a few weeks ago that the Dooncarton Hill is only "Probably Safe" and some areas are still at "High Risk"

Therefore, the proposed development is taken place in a zone of natural ground instability in an area above and adjacent to the longest landfall to terminal connection in the world.

If the terminal was located offshore or on a coastal region then it would be quite easy to carry out visual inspections of the pipeline under the water. Natural ground movement would be less intrusive on the high pressure connecting pipe work. The water surrounding the pipeline would not resist lateral loading, and thus not cause differential lateral movement of the pipeline and would be less likely to fail than when buried in the ground. This is one of the reasons why all other worldwide connections are made either offshore or to a coastal-based terminal.

The landfall location (for the high-pressure untreated gas pipeline network) is at the foot of Dooncarton Hill. Following the September 2003 landslide, this hill has only recently be classified by consultants employed by Mayo County Council as been "Probably Safe" and the Landfall is located in an area of "High Risk". A landslide can rupture and shear the high-pressure untreated gas line and umbilical line resulting in extreme human and environmental catastrophic disasters.

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Health & Safety Implications Associated with the Proposed Development have not been fully addressed or controlled.

The Proposed Development Fails to Comply with Seveso II Directive [96/82/EC]

Current legislation requires that the planning process for new developments take into consideration the risk from industrial facilities that present a major accident hazard. Planning authorities are required to seek technical advice from the Health and Safety Authority (HSA) in relation to proposed and existing affected development.
The HSA must consider and advise on, the anticipated types and quantities of materials, the developing and changing processes associated with all industries.

Shortcomings in the applicant's submission into preventing, controlling and excluding personnel and the environment from High Risk Events are evident throughout the application.

The proposed Development is a Seveso II High Risk Event Industry with Local Residents residing within the Construction Sound buffer zone

The Environmental Risk Assessment of the Effects associated with the Key Hazard Scenarios are listed in Section 17 "Mitigation and Impacts Summary and Impact Interactions" in Table 17.5. The applicant has identified that the release of Flammable Liquid, Condensate, Product and Wet Methanol is possible.
The applicant has also stated in Section 4 "Alternatives" subsection 4.5.1 of the EIS report that fires are possible and hence explosions can occur when they state that one of the reasons for a flat site is " *to facilitate fire fighting around storage tanks*". They have also identified that when these materials are associated with a fire, that the Overall Risk Category is High.

Imprudently, the Applicant only provides information in relation to the "bunding / catchment" containment of such materials without the effects of fire, i.e. prior to explosion.

The quantity of explosive material on site indicates that this establishment is a "Seveso II High Risk Industry". Local Residents are so close to the proposed development that even the applicant has identified in Section 17 "Mitigation and Impacts Summary and Impact Interactions" in Page/Table 17-6) that they will be affected by the sound arising from construction works.

It is therefore, quite obvious that the residents are not far enough away from the development or the events and consequences that can arise in a Seveso II High Risk Event Industry.

The Applicant has failed to fulfill the Aims of the Seveso II Directive [96/82/EC]

Lets be clear, the aim of the Seveso II Directive is for the:

"*prevention of major accidents which involve dangerous substances, and the limitation of their consequences for man and the environment, with a view to ensuring high levels of protection throughout the Community in a consistent and effective manner.*"

The applicant has purposely ignored how to effectively control the consequences arising from a High Risk Category as the land associated with Vapour Exclusion Zone (Gas Cloud in atmosphere arising from a gas leak prior to explosion) or the Thermal Exclusion Zone (Heat given off from an explosion) are outside the site boundary and hence outside the applicant's control.

The proposed gas terminal development is sited on the catchment, streams and rivers carrying water supply to Carrowmore Lake and hence a High Risk Category event will have a consequential effect on these streams and rivers. Therefore man and the environment will be affected since Carrowmore Lake is a major water supply for the entire Erris Community.

Therefore, the aims of the Seveso II directive are not adhered too. The applicant fails to limit the consequences arising from a major accident and has not provided the high level of protection required under the aim Seveso II Directive.

The Anticipated Presence of Substances have not been verified or properly addressed as required under the Seveso II directive

The Applicant fails to include and identify all products/substances associated with the Gas Processing Industry and therefore the anticipated presence of dangerous substances cannot be properly addressed.

The applicant is requesting permission to:

"CONSTRUCT GAS TERMINAL FOR THE RECEPTION AND SEPERATION OF GAS FROM THE CORRIB GAS FIELD..."

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The text of the applicant's application does not identify the **type** of gas to be received, separated or processed. There is no verified independent advice to identify that the Corrib Gas is a "Dry Gas". Depending on the source, the by-products of a natural gas processing plant vary and are more explosive than the process of "Dry" Gas.
The foreshore license has been awarded for a period of up to 99 years.

Future exploration and gas finds can be connected/linked to the Corrib gas zone and then brought ashore using this proposed development infrastructure without further planning implications, similar to other world wide gas terminal developments.

It is very unlikely (even after a HSA assessment) that a project worth a half a billion euro will be refused to process other types of gases! If the infrastructure is there then use it!

"Ireland has one of the largest offshore Oil and Gas exploration areas in Europe. Hydrocarbons have been found and exploited in the Celtic Sea, the Porcupine trough and in the Corrib Basin.Ramco, Enterprise Oil and Providence Resources have exploitable reserves".
Text taken from
http://www.tradepartners.gov.uk/oilandgas/ireland/profile/overview.shtml

Refer to Appendix A for the location of these areas.

With advances in mechanics, chemistry and technology any modifications necessary to treat "alternative gas types" can take place within the proposed building footprint or within some minor extension.

The Seveso II directive requires that;

"the 'presence of dangerous substances' shall mean the actual or anticipated presence of such substances in the establishment, or the presence of those which it is believed may be generated during loss of control of an industrial chemical process, in quantities equal to or in excess of the thresholds"

The anticipated presence of a substance within an establishment and the consequences of its effects must be assessed to comply with the Seveso II Directive. The anticipated presences of other dangerous substances associated with the Gas Industry cannot be ignored and must be addressed now **regardless if the presence** of this anticipated substance requires a future planning permission or not. Permission is currently being sought for a GAS TERMINAL.

The Seveso II directive **does not state nor does it allow** that the, "anticipated presence of a substance" can be dealt with at a later stage under a separate and/or future application. A more highly explosive substance with more highly explosive chemicals, than what is currently proposed can be brought ashore to produce natural gas e.g. the recent gas explosion in China affected a 25sq km area and was labeled a "Death Zone"

Therefore, in adherence and compliance with the Seveso II directive, the HSA zoning criteria for this proposed establishment must consider the anticipated presence and the processing of all types of gas (e.g. "Dry" and "Wet") and their products, as different gas types other than "Dry" can be brought ashore and processed.

The applicant must supply and include all the types and cumulative quantities of the anticipated products/byproducts used in the gas processing industry. These types and quantities should be independently verified. That is what the development is intended to be; an Industrial Gas Processing Plant. The HSA must consider the 'anticipated' presence of dangerous substances associated with all types of gas processing otherwise; the proposed development will not be in compliance with the Seveso II directive.

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The Government, Local Authority and Applicant has failed to Comply with Article 8 (Domino Effect) and Article 12 (Land-Use Planning) of the Seveso II Directive

To further comply with the Seveso II directive under Articles 8 and 12

[Article 8: Domino Effect]

"Member States shall ensure that the competent authority, using the information received from the operators in compliance with Articles 6 and 9, identifies establishments or groups of establishments where the likelihood and the possibility or consequences of a major accident may be increased because of the location and the proximity of such establishments, and their inventories of dangerous substances."

The applicant fails to consider the "Domino Effect" arising from a leak/explosion that can occur at the terminal site and consequentially travel along the high-pressure pipeline. Therefore, I request that all authorities especially the HSA must assess this possible scenario and limit its consequence.

[Article 12: Land-Use Planning]

"Member States shall ensure that the objectives of preventing major accidents and

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limiting the consequences of such accidents are taken into account in their land use policies and/or other relevant policies. They shall pursue those objectives through controls on :

a. *the siting of new establishments,*
b. *modifications to existing establishments covered by Article 10,*
c. *new developments such as transport links, locations frequented by the public and residential areas in the vicinity of existing establishments, where the siting or developments are such as to increase the risk or consequences of a major accident."*

In considering the proposed terminal site:

The government shall ensure that the local Authority, using information received from the applicants, must identify sites or groups of sites that are possible candidates for the presence of dangerous substances in accordance and in adherence to the aims of the Seveso II directive.

Thereafter, the member state (Government) shall ensure that the objectives of preventing major accidents and limiting the consequences of such accidents (especially the consequences of community livelihoods and the environment) are taken into account in their land use policies.

In considering/granting this terminal site all relevant local and state authorities will fail to conform to the objectives of Seveso II Article 12 Land-Use Planning Policy as there are many more available sites in the Mayo area including Erris that are more appropriate under the directive than that of the proposed site. The development is taken place in close proximity and within the catchment of Carrowmore lake, where streams and rivers connecting to the lake will not be protected in the event of a major accident and hence pollution of the only water supply for the Erris Area.

HSA Zoning for Alternative Sites not Provide

HSA Must examine "Alternative Sites" and compare them to the Proposed Site in order to comply with Article 12[Land Use Planning] of Seveso II Directive

A site-specific analysis of all possible alternative industrial sites must be carried out by the HSA in order to advise the Local Authority on the best-suited sites for this industrial development in order to comply with Seveso II directive.

The HSA has not provided a compressive and comparative analysis of the alternative sites under the specific criteria of the Seveso II Directive, Pollution and Traffic Acts. The applicant has ruled against other establishments (sites for the terminal and pipeline) on their own merits, mainly on the basis of potential economic gain.

I request that alternative sites be examined which should be outside the catchment area of a major drinking water supply for the local community (in this case the entire Erris Area). This information should then be made available to the public for observation. In failing to do so Article 12 "Land Use Planning" has not been properly addressed by the HSA.

The Health, Safety and Welfare of a community (in this case the Erris Community) in close proximity to an Industry associated with the proposed Industical Gas processes, including the Storage and distribution of Explosive Substances should be accessed on the basis of the:

- Seveso II Directive
- Pollution and
- Traffic Safety

These criteria under the HSA heading should take precedence over Special Areas of Conservation or Areas of Scenic Amenity etc.

Thereafter, the basis of economic gain etc. should apply.

The Seveso II directive applies to all areas within an Establishment.

The term 'ESTABLISHMENT' under the Seveso II directive includes the Upstream High Pressure Landfall to Terminal Pipeline and therefore a HSA Zoning around the pipeline must be applied in order to provide the appropriate health and safety for local residents, which was also previously identified as a Health and Safety Hazard.

The term 'establishment' under the Seveso II directive includes the High Pressure Landfall to terminal pipeline that was previously ignored by the Applicant and the HSA.

Extracts from the directive

Article 1; The Aim of The Directive

This Directive is aimed at the prevention of major accidents, which involve dangerous

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*substances, and the **limitation** of their consequences for man and the environment, with a view to ensuring high levels of protection throughout the Community in a consistent and effective manner.*

Article 2; Scope

*The Directive shall apply to **establishments** where dangerous substances are present in quantities equal to or in excess of the quantities listed in Annex I....*

*For the purposes of this Directive, the 'presence of dangerous substances' shall mean the **actual** or **anticipated** presence of such substances in the **establishment**, or the presence of those which it is believed may be generated during loss of control of an industrial chemical process...*

Article 3; Definitions

*'establishment' shall mean the **whole area** under the **control** of an operator where dangerous substances are present in one or more installations, including common or related infrastructures or activities*

- The directive applies to the whole area under the control of the applicant.
- The applicant is the only person who controls the flow in the pipeline and therefore the area of the pipeline.
- Under the foreshore license the applicant has the authority to enter, use and occupy the licensed area for the purpose of constructing, installing, locating, operating, maintaining, inspecting, testing, repairing any of the facilities. The applicant has principal control of the land when their activities are associated with the pipeline.
- The pipeline is also a common or related infrastructure.

It is therefore obvious that the pipeline from the Gas Field to the Terminal and especially that section of pipeline from the landfall to the terminal is within the "Establishment" as defined by the Seveso II directive.

Article 4;Exclusions
This Directive shall not apply to the following:

*d. the transport of dangerous substances in pipelines, including pumping stations, **outside establishments** covered by this Directive;*

THIS IMPLIES THAT PIPEWORK AND PUMPING STATIONS **WITHIN** ESTABLISHMENTS ARE UNDER THE SEVESO II DIRECTIVE

Therefore, the HSA must apply the Seveso II directive to the pipe work defined as 'Gas Pipeline, Control Umbilical and Discharge Pipeline under the foreshore license and determine an appropriate HSA Zone (separation distance) away from them.
Alternatively, they must assess the long-term health and safety aspects of the pipeline. If health and safety aspects cannot be addressed now, how can they be addressed in the event of a catastrophe? It is not acceptable to hide behind the risks and consequences of this terminal and pipeline in their proposed locations. People's lives are at risk.

A point of Information;
The separation distance from residential properties to a small-scale sewerage treatment plant to avoid odour and noise, in accordance with EPA Guidelines is a minimum of 50m.

The separation distance from residential properties to a high pressure untreated explosive gas pipeline like that coming from the landfall to the terminal should be at least a high multiple of 50m away. A more realistic figure of 500-1000m or greater should undoubtedly be provided. This is not the case and it was previously pointed out that some residents are less than 70m away from the pipeline.

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Non-Performance or Non-Observance by the licensee implies that the Minister for the Marine can now withdraw Foreshore Licence

The Applicant has not identified/observed common risks associated with the proposed pipeline infrastructure route as shown on the Foreshore Licence.

Under the terms of the Foreshore Act 1933, Section 3 Par 5 the Minister has the power to '*terminate such licence on breach, non performance, or non-observance by the licensee*'. The following is a list of items that should have been considered/ observed during the application of the Foreshore Licence.

- The applicant has failed to investigate, observe or consider the stability of the surrounding landscape including Dooncartoon Hill either prior to, during or after an explosion event occurring at the terminal and/or anywhere along the Gas Line. Vibrations in the ground following an explosion can destabilise the already unstable high risk Dooncartoon hill (one of the highest hills in Erris). The applicant's submission now identifies these events as well.

- The Applicant fails to address how they intend to monitor, control and prevent landowners/trespassers from disturbing/digging the only inland high-pressure untreated gas line in the world, together with the *Discharge pipeline* and *Control Umbilical*.

- The applicant fails to identify how they intend to support the Gas Pipeline, Discharge Pipeline and Control Pipe (as defined in the Foreshore Licence) and prevent them from excessive deformation and hence failure especially when the pipeline infrastructure is supported on Peat.
  Does the applicant intend to remove all the peat under the pipeline?

- As previously discussed in this submission and as identified by the applicants design team, Peat has failed on slopes as low as 2 degrees. The pipeline route is through an abundance of peat. The applicant has failed to identify how they intend to protect this pipeline from such events.

- The applicant fails to address how they intend to prevent surcharge loadings on the ground arising from common general/agricultural use on the Gas Pipeline, Discharge Pipeline and Control Pipe (as defined in the Foreshore Licence) infrastructure servicing the gas terminal. The surcharges can either arise from heavy farm machinery or stock piling in a specific area. These effects can cause the pipelines to fail.

- The foreshore licence was granted without assessing the land policies in accordance with Article 12 of the Seveso II Directive. A site should have been chosen based on the *prevention of major accidents, limiting their consequences for man and the environment and ensuring high levels of protection throughout the community*. The proposed site does not meet the aims of the Seveso II directive. Therefore, the licence for the pipeline is not valid.

- Incorrectly, the previous Minister believed that this was the best site and issued a licence upon false and misleading information.

- The overwhelming impacts of the terminal on the landscape following High Risk Events arising at the terminal and/or along the pipeline as identified in the applications submission and collated in this report identifies that this IS the wrong site.

- The proposed development is;
  - Within the catchment area of Carrowmore Lake the only drinking water supply for the entire region.
  - The only inland terminal in the world.
  - In a landscape of natural ground instability.
  - Surrounded with Blanket Bog that can fail at 2 degrees, in an area of ground outside the applicant's control.

The Seveso II directive was written following the events and consequential affects thereafter, in the town of Seveso, Italy in 1976.
The local community do not want the Erris EU Directive for a similar future disaster. Major events will happen if this site is chosen for this development. There are better sites available in Erris and indeed in Mayo.

If the above events cannot even be addressed at this stage, how do we expect them to be addressed when they happen? It is no good hiding behind reality.

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Therefore, I request that the Minister must enforce the powers he has from the Foreshore Act and terminate this licence as the applicant has failed to observe, identify and control the above events. Failure to address these events will undoubtedly have a major consequential impact on human beings and the environment.

Otherwise, I request that the Health and Safety Authority assess the location of the landfall and high-pressure pipe work that contains the untreated gas as the landfall and pipeline will cause a serious human and environmental risk in its proposed location.

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Previous Reasons for Refusal still Valid

First Reason for Previous Refusal Still Valid

> *...The proposed gas processing terminal, forming part of a subsea tie-back development concept, would be sited in a remote, rural, unserviced, inland location some 8km from the landfall and away from centres of population in the region.*
>
> *The siting of the proposed development, with its significant tie-back constraints, would be contrary to the strategic planning of infrastructural development for the Border Midlands West Region.*
>
> *Furthermore, the proposed large industrial development would be located in an elevated and unspoilt rural setting in an area of scenic and ecological value lacking in public services and essential facilities. The policy of the planning authority, as set out in the current Mayo County Development Plan, is to protect the natural environment, to enhance the amenities of the county and to ensure that the availability of infrastructural facilities is not a limiting factor in the promotion of industrial development. In addition, it is an objective to strictly control development which might prove injurious to the amenity value of the Carrowmore Lake area of special scenic importance.*
>
> *The proposed development would conflict with the policies of the planning authority by reason of:*
>
> *(a) the imposition of a large industrial development in a remote inland rural location that is seriously deficient in public infrastructure to serve the development;*

This statement is still true and valid and forms a basis of my objection.

> *(b) the visual obtrusiveness of the development when viewed from the west and the visual intrusiveness when viewed from the south, from local roads to the north-west and north-east, and from Carrowmore Lake by virtue of the siting of a large industrial complex on a prominent, open and exposed bogland hill, resulting in a significant deterioration of the landscape character of the area;*

This statement is still true and valid and forms a basis of my objection.

> *(c) the irreversible alteration of this landscape arising from the site development works proposed;*

This statement is still true and valid and forms a basis of my objection.

> *(d) the degradation of the fragile ecology of the area arising from the intensive industrial activities of the construction and operational phases of the development;*

This statement is still true and valid and forms a basis of my objection.

> *(e) the environmental and public safety implications derived from the construction works; and*

The applicant has increased the environmental and public safety risks with the recent application. The proposal of excavating and removing overwhelming quantities of acidic blanket bog North of Carrowmore Lake and transporting it by road to the water lodged deposition site at Srahmore, South of Carrowmore Lake.
This proposal has greater implications and the previous reason for refusal is now reinforced and is true and valid and forms a basis of my objection.

> *(f) the significant increase in traffic volumes and HGV movements at the construction stage onto a road network that is substandard in width, pavement and alignment.*

Traffic volumes and HGV movements have dramatically increased compared to the previous proposal. There are eighty two thousand (82,000) more truck movements required to transport the peat to Srahmore.
This statement is still true and valid and forms a basis of my objection.

- The constraints of this site have not changed.
- The traffic movements arising from this recent application will dramatically increase (compared with the last application) arising from the Excavation and removal of at least 450m3 of Blanket Bog
- The Environmental and Public Health and Safety implications are more severe as the disturbance of acidic blanket bog South of the neutral water source of Carrowmore Lake, and the deposition of such large quatities of disturbed acidic blanket bog at a waterlogged site at Srahmore South of Carrowmore Lake. There is 405,000,000 litres of acidic water contained in the peat.

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Second Reason for Previous Refusal

Having regard to the likely instability of the proposed containment bunds and the waste peat to be stored in the peat repositories arising from the failure to design an effective surface water drainage system to ensure the integrity and retention of waste materials stored in the permanent repository structures on a slope above Regional Road No. R314 and in close proximity to watercourses draining to the Glenamoy River and Sruwaddacon Bay, the consequent safety risk to the local community and the pollution risk arising therefrom, it is considered that the proposed development would endanger the health and safety of the general public in the vicinity of the site, would seriously injure the amenities of property in the vicinity, and would adversely affect the use of the regional road. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.

The applicant is just transferring and adding to the problems encountered in the previous application to a waterlogged site at Srahmore. The volume of excavated material and the volume of traffic associated with the construction works have dramatically increased with this recent application.

An **additional 82,000 truck movements** are introduced to the public road by removing the peat to Srahmore some 11km from the development site. This route is the shortest route available for all residents in the North Erris area, travelling to Castlebar General Hospital in the event of an emergency. The route is inadequate in formation width and alignment for overtaking traffic movements.

The applicant has now spread the environmental impact by excavating and depositing huge quantities of acidic Peat containing at least **405,000,000 L i.e. four hundred and five million litres of acidic water** to a site at Srahmore close to a major source of drinking water supply for the entire region (Carrowmore Lake).

The context of the second reason for refusal is still valid but the environmental impact spread has increased. These works are now taking place to the North and South boundaries of Carrowmore Lake, the only public water supply for this region.
The recent application will now largely affect four areas - Bellinaboy, Srahmore, Mountain face quarry at Bangor Erris and the Mountain face Quarry at Glencastle.

If an onshore facility is ultimately required then, a coastal site should be chosen where, the ground is stable and where most of the raw materials can be processed on site (i.e. quarry the rock on site to produce the hardcore required for fill and to make concrete etc). This would dramatically reduce construction traffic on public roads and contain the development to one specific location. A site should be chosen outside the catchment of a major drinking water supply for a region. The health and welfare of individuals should take precedence over special areas of conservation and scenic amenity.

The second main reason for the previous refusal as identified above is enhanced based on the recent application and is a further reason for refusal.

Estimated Quantities:
As with the previous application, there are significant variations in the material quantities being estimated once again by the applicant. The application requires planning for the excavation and removal of 450,000m^3 of soil, however, Section 4 "Alternatives" subsection 4.5 of the Environmental Impact Statement states " 450,000 m^3 of Peat and 50,000 m^3 of mineral soils will be removed." Disposal of disturbed soil will also take up more volume than its current insitu volume.

Difficulties associated with Total Peat Removal (Previously Quoted by the Applicant):
Continuing inconsistency and contradictions in the applicant's submissions (previous and current) is a matter of great concern. In this recent planning application, the applicant has now concluded that the removal of all the peat is now the best and preferred option.

The applicant now states in Section 4 " Alternatives" subsection 4.5.7 of the EIS report that

> *"...total peat removal would present the best practical option for the terminal both for its construction and operation."*

I believe the above statement to be false and inaccurate for the reasons previously submitted by the applicant and stated on page 251 of An Bord Pleanala's report.

It is known that existing drainage from previous land use; either cut into, or installed below, the skin of the upper peat can affect the pore pressures in the main body of the peat. When drainage is taking place the pore pressures are reduced and this helps stabilise the peat, but when they are rapidly saturated and drainage is blocked, the build up in pore pressures can destabilise the peat. The site at Srahmore becomes water lodged in periods of prolonged rainfall.

The applicant previously ruled against the removal of the peat as there were many disadvantages associated with this work.

The disadvantages noted by the applicant include:

- *A large volume of peat would have to be removed thus increasing the quantity of peat to be stored.*
- *The removal of all peat would require trenches up to 4.5m in depth in peat, major temporary works would be required including use of heavy piling plant, and*

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there would be additional safety risks for ground workers.

- *The excavation of trenches would pose a safety risk to the workforce.*
- *The excavations would fill with water and dewatering would be required and the water disposed of.*
- *There would be construction and safety difficulties in placing fill and working under water if dewatering was ineffective.*
- *Trafficking and disturbance of adjacent peat surfaces, possibly causing a reduction in strength, would result.*
- *A large volume of fill would have to be imported onto the site.*
  Mineral soil embankments may form a migration path for run-off into the underlying mineral soil and bedrock.

The above disadvantages previously submitted by the applicant still are relevant.

There is no known example of where successful large deposition of saturated blanket bog has taken place. I object to the removal of such large quantities of acidic peat and deposition of same close to a major neutral water supply for the Erris Area.
I also object to the 82,000 traffic movements this work will incur.

Third Reason for Previous Refusal Still Valid

Having regard to the provisions of Directive 96/82/EC ("Seveso II") in relation to land use planning (Article 12) and Circular Letter PD 6/99 from the Department of the Environment and Local Government and having regard, in particular, to the submissions from the National Authority for Occupational Safety and Health, the designated Central Competent Authority for the purposes of the Directive, the Board is not satisfied, on the basis of the submissions made in connection with the planning application and the appeal, that the proposed development could not, due to the risk of a major accident or if a major accident were to occur, lead to serious danger to human health or the environment. The proposed development would, therefore, give rise to an unacceptable risk to members of the public due to the proximity of the terminal site to residential properties and areas of public use to which the Directive applies and would, thus, be contrary to the proper planning and sustainable development of the area.

This statement is still valid and the events and consequences associated with this directive affect areas that are within the catchment of Carrowmore Lake on land that is outside the control of the Applicant.
Surface water, streams and rivers discharging to Carrowmore Lake can become contaminated with chemicals arising from events as identified by the applicant and in the Seveso II directive.

Therefore, the aim of the Seveso II directive is not fulfilled, as the consequences of an event cannot be controlled and limited.
.

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Some Recent Explosions and Pipeline Burst Events

Explosions

Country	Date	Explosion	Area affected
Moomba	Jan 2004	Gas	6 sq miles (Plant)
China	Dec 2003	Gas	25 sq miles (Well)
Umtata	Sept 2003	Gas	12 sq miles
Ughelli	April 2001	Gas	Entire Community (Plant)
Illinois	Nov 1998	Gas	4 sq miles (Pipeline)
Lfd, Victoria	Sep 1998	Gas	Within the Plant
WILL, Ohio	July 2000	Gas	4 sq miles (Plant)

Pipeline Disasters

Note: Implying that pipelines do burst. This development is no different

Louisiana	Jan 21	Equilon **offshore** pipeline **spills 94,000 gallons of crude oil** off coast of Louisiana.
Winchester KY	Jan 27	Marathon Ashland pipeline near Winchester KY spills 900,000 gallons of gasoline, **almost reaching Kentucky River, major drinking water source.**
Knoxville TN	Feb 9	Colonial pipeline ruptures near Knoxville TN, spilling 53,550 gallons of diesel fuel **into Tennessee River.**
Greenville TX	March 9	**Explorer** pipeline at Greenville TX spills 564,000 gallons of gasoline into creek, **upstream from main drinking water supply of Dallas.**
Piney Point MD	April 7	Potomac Electric pipeline at Piney Point MD spills 140,400 gallons of fuel oil, **polluting creek and Patuxent River.**
Houston TX	May 20	Pipeline in Houston TX spills 84,000 gallons of gasoline, some into Hall's Bayou, tributary of Houston Ship Channel.
Blackman Township MI	June 7	Pipeline in Blackman Township MI spills 100,000 gallons of gasoline on ground and into Grand River.
Carlsbad NM	August 19	El Paso gas pipeline explodes in fireball near Carlsbad NM, **killing extended family of 12 people on camping trip**
Abilene TX	September 8	Propane pipeline near Abilene TX explodes in fireball, **killing motorist, injuring woman** who saved self by diving into a swimming pool.
Vaquillas TX	November 30	Natural gas pipeline explodes in Vaquillas TX, **killing backhoe operator, inuring another.**

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Reproduced extracts from An Bord Pleanala

Dated April 2003
Prepared by Kevin Moore
Senior Planning Inspector

"I do not accept that offshore risks would be significantly high as the shallow water fixed steel jacket option would address the applicant's concerns relating to water depth, harsh environment at the field location and other geographical parameters."

I put forward the observation that pipelines constitute one of the least costly items identified in the applicant's schedules of costs.

the applicant's agent from Granherne stated at the hearing that it is technically feasible to develop Corrib in a different way.

While one of the main economic arguments for not developing an offshore platform is based around this lack of infrastructure, it is significant that this same issue on land is one of the main material matters that emphasises how remote the inland terminal site really is and places a material and significant planning constraint on the proposed development. Furthermore, regarding references to other proposed tie-backs, the siting of their terminals in coastal areas, whether close to urban areas, near shipping lanes, etc., makes these other tie-backs materially and significantly different proposals from that now before the Board. The proposed development would be a remote terminal in a rural area, some distance from the landfall, and not associated with the coastal area, shipping, or existing gas infrastructure.

The proposed subsea tie-back would be the second longest in the world. It will also be the only tie back that links the gas well to an inland terminal.

"The root cause of the problem is that the site chosen for the Gas Terminal is unsuitable."

It is evident that the significant environmental cost that would result from the development being sited in a location that comprises a vulnerable, remote, unserviced, rural landscape confirms it be the wrong site.

Page 222 of 377 of the Planners Report from An Bord Pleanala report stated that for the previous submission the "storage of methanol for the proposed development was considered excessive by the third parties and was offered as an indication that there are plans or intentions to greatly expand the terminal".
Reviews of other licienced gas/oil block areas off the west coast of Ireland certainly reinforce the above statement made previously by An Bord Pleanala. These blocks scatter and extend beyond Northern Ireland and to the South of Kerry and extend to an area approximately 200miles off the west Coast.

Also, and extremely significant, is that while a subsea pipeline to shore is common to all options, offshore processing would allow dry conditioned gas to be transported long distances (over hundreds of kilometres as described by the developer). This would be a significant advantage in considering alternative locations for landfall as it would eliminate the concerns of transporting gas that has not been conditioned over a lengthy distance of 92km to a terminal onshore. Furthermore, I note that a significant constraint factor influencing landfall selection, and thus influencing terminal site selection, is the need to minimise the length of the subsea umbilical in order to avoid, if possible, the need for subsea joints, which as the applicant has highlighted can be a source of failure. The development as proposed will have a joint at the landfall to keep the subsea continuous length of the umbilical to a minimum. It is admitted that the umbilical proposed for the Corrib Field would be one of the longest umbilicals in the world. The option of a shallow water fixed steel jacket would significantly reduce the length of this umbilical, thus reducing the need for subsea joints, thus limiting a source of failure.

The land at Asahi is zoned for industrial use.

No considerations in terms of cost, safety or the environment appear to be given in any detail to the cost of the risk environment that would be imposed on the local community.

The development of a gas processing terminal at Ballinaboy is not inherent in any local, regional or national policy

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documents, inclusive of the National Spatial Strategy.

The proposed subsea tie-back would be the second longest in the world.

From the details provided by the applicant on existing subsea tie-backs around the world that are regarded as similar in principle to Corrib, all are tied back to offshore processing platforms, not land-based terminals. This is notwithstanding varying available reserves.

What is known of proposed subsea tiebacks, their proposed processing terminals on land would be sited in coastal areas and not inland in remote rural locations.

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APPENDICES

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Appendix A

THE EUROPEAN GAS NETWORK

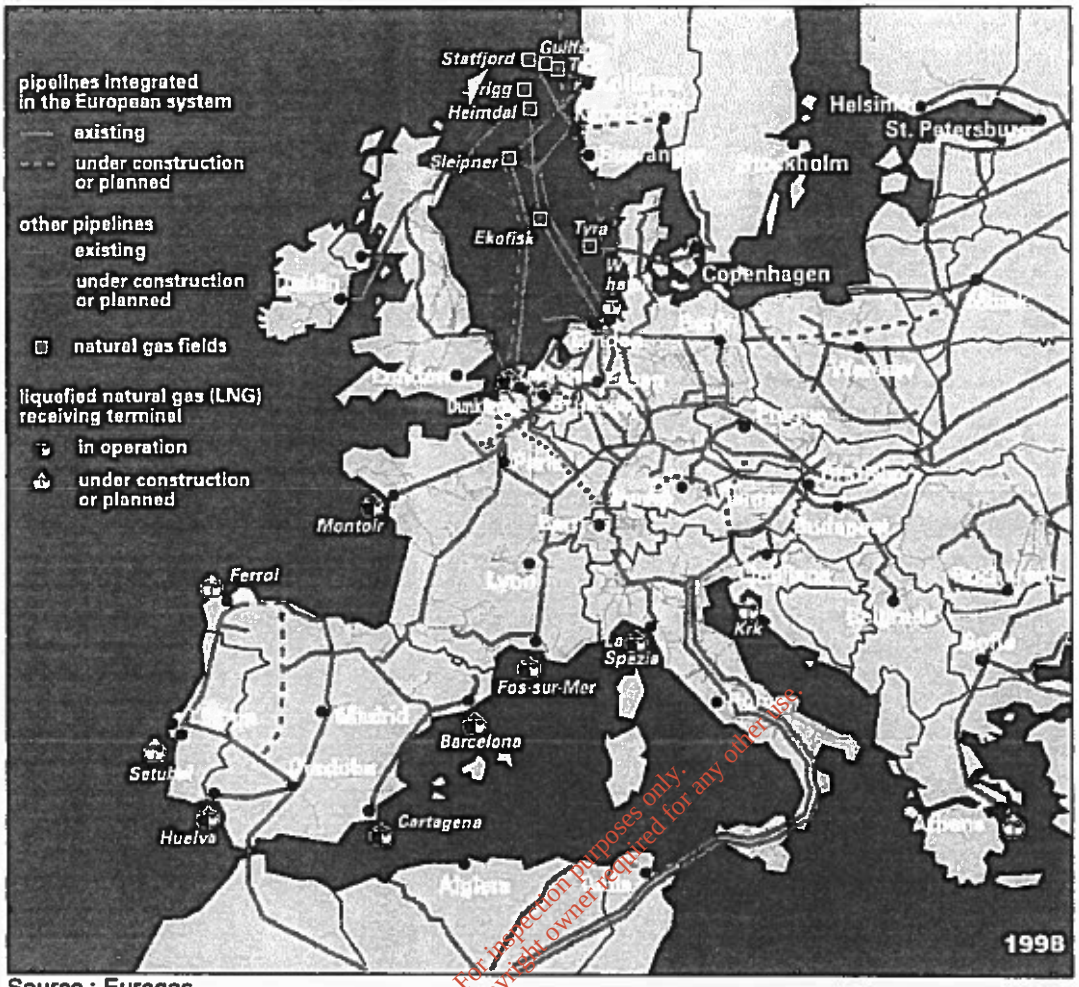
OTHER LICENSED BLOCKS GRANTED FOR EXPLORATION BEFORE 2003

IRISH WATER BLOCKS INCLUDING EXPLORATION BASINS

2003/2004 ADDITIONAL LICENSING INITIATIVES AT THE PORCUPINE BASIN

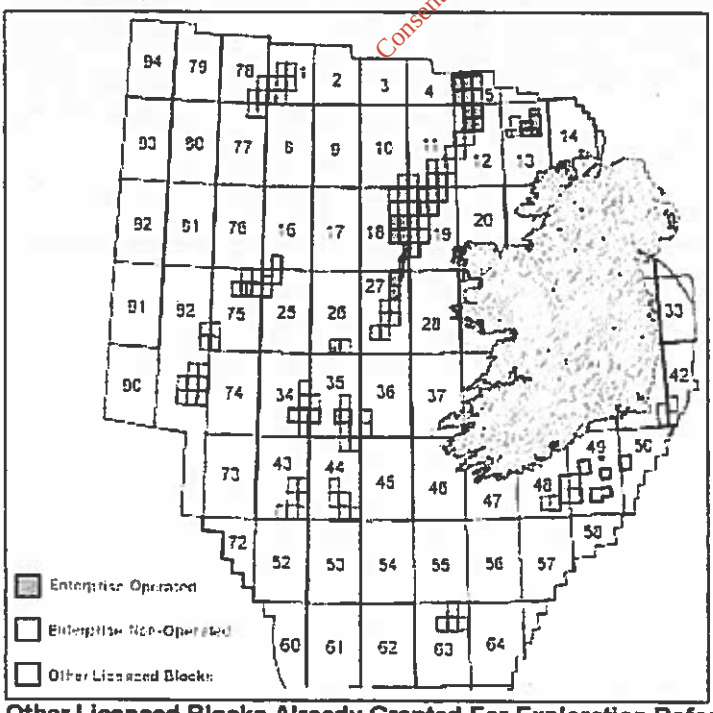
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Source : Eurogas

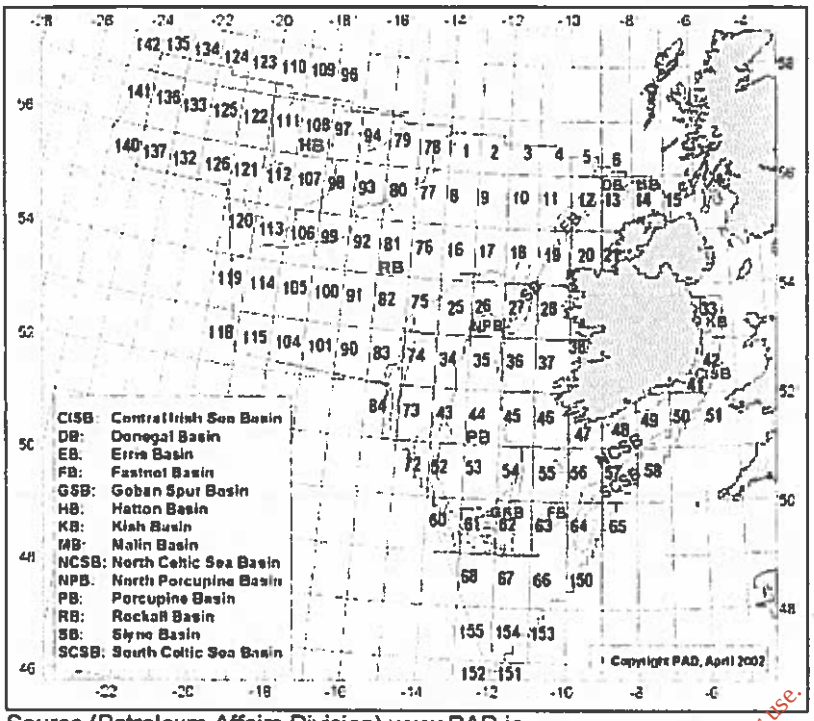
The European Gas Network (Corrib Gas can be transported to Africa and Russia)



Other Licenced Blocks Already Granted For Exploration Before 2003

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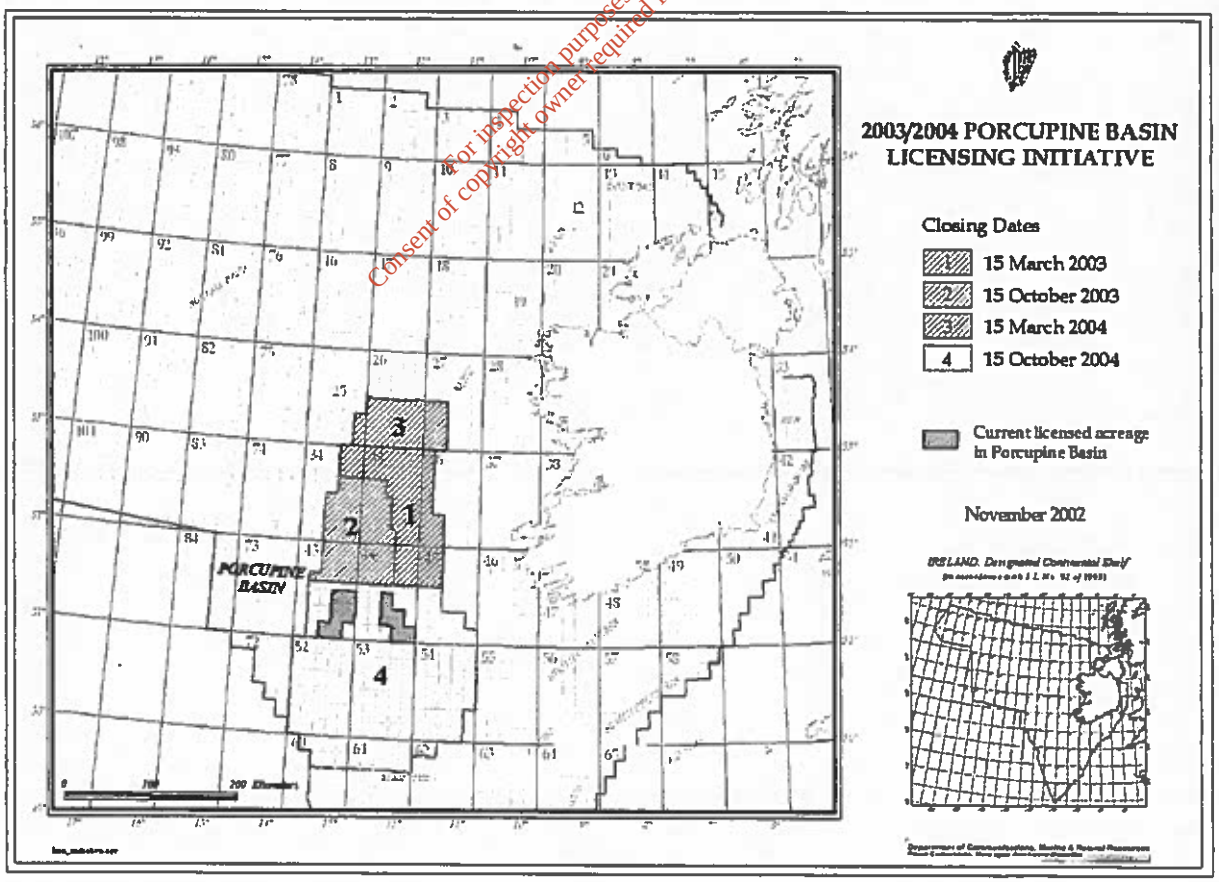
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Irish Water Blocks including Exploration Basins

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Source (Petroleum Affairs Division) www.PAD.ie

2003/2004 Additional Licensing Initiatives at The Porcupine Basin

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Appendix D

SCANNED

Examples of

Fixed Platforms

Floating Production Systems

And

Subsea Tie-Backs

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North America	North Sea
Baldpate Gulf of Mexico, USA	Alba Phase II North Sea Northern, UKingdom
Bombax Pipeline Development, Trinidad and Tobago	Åsgard North Sea Northern, Norway
Brutus Gulf of Mexico, USA	Balder North Sea Northern, Norway
Cantarell Oil Field, Mexico	Banff North Sea Central, United Kingdom
Canyon Express Gas Field, Mississippi Canyon, USA	Blake Flank, United Kingdom
Deep Panuke, Canada	Boulton North Sea Southern, United Kingdom
Devils Tower Gas Field, Gulf of Mexico, USA	Brigantine North Sea South, United Kingdom
Genesis Gulf of Mexico, USA	Britannia North Sea Central, United Kingdom
Gyrfalcon Gulf of Mexico, USA	Bruce Phase II North Sea Northern, U Kingdom
Hibernia Grand Banks, Canada	Caister Murdoch Phase 3, United Kingdom
Hickory Gulf of Mexico, USA	Captain North Sea Central, United Kingdom
Hoover Diana Gulf of Mexico, USA	Clair Field, Shetlands, United Kingdom
Horn Mountain Field, Gulf of Mexico, USA	Cook North Sea Central, United Kingdom
Magnolia Field, Gulf of Mexico, USA	Curlew North Sea Central, United Kingdom
Manatee Field, Gulf of Mexico, USA	Dunbar Phase II North Sea Central, UKingdom
Mardi Gras Oil and Gas Transportation System, USA	ECA North Sea Southern, United Kingdom
Mars Gulf of Mexico, USA	Ekofisk II North Sea Central, Norway
Matterhorn, Gulf of Mexico, USA	Elgin Franklin North Sea Central, U Kingdom
Mensa Gulf of Mexico, USA	Erskine North Sea Central, United Kingdom
Morpeth Gulf of Mexico, USA	ETAP North Sea Central, United Kingdom
Na Kika Oil and Gas Fields, Gulf of Mexico, USA	Gannet North Sea Central, United Kingdom
Nansen Boomvang Gas Field, Gulf of Mexico, USA	Glitne North Sea Northern, Norway
Neptune Gulf of Mexico, USA	Goldeneye Gas Platform, United Kingdom
Petronius Gulf of Mexico, USA	Gullfaks North Sea Northern, Norway
Ram Powell Gulf of Mexico, USA	Hanze F2A, Netherlands
Sable Island Scotia Shelf, Canada	Jade Oil and Gas Platform, United Kingdom
Serrano/Oregano Gulf of Mexico, USA	Janice North Sea Central, United Kingdom
Tahoe Gulf of Mexico, USA	Jotun North Sea Northern, Norway
Tanzanite Gulf of Mexico, USA	Kristin Deepwater Project, Norway
Terra Nova Grand Banks, Canada	Leadon North Sea Oil Field, U Kingdom
Thunder Horse Oil Field, Gulf of Mexico, USA	MacCulloch North Sea Central, U Kingdom
Troika Gulf of Mexico, USA	Magnus EOR, United Kingdom
Typhoon Gulf of Mexico, USA	Mikkel Deepwater Project, Norway
Ursa Gulf of Mexico, USA	Njord North Sea Northern, Norway
White Rose Oil and Gas Field, Canada	Norne North Sea Northern, Norway
	NUGGETS North Sea Northern, UK
	Ormen Lange North Sea Northern, Norway
	Oseberg Sør North Sea North, Norway
	Pierce North Sea Central, United Kingdom
	R Block Development North Sea, U K
	Ross North Sea Central, United Kingdom
	Shearwater North Sea Central, U Kingdom
	Sigyn Gas Field, Norw North Sea, Norway
	Siri North Sea Northern, Denmark
	Snøhvit Gas Field, Barents Sea, Norway
	Snorre North Sea Central, Norway
	South Arne North Sea Danish, Denmark
	Triton North Sea Central, United Kingdom
	Troll West North Sea Northern, Norway
	Valhall Flank Water Inj Platform, Norway
	Viking B North Sea Southern, UK
	Visund North Sea Northern, Norway
	Vixen North Sea South, United Kingdom

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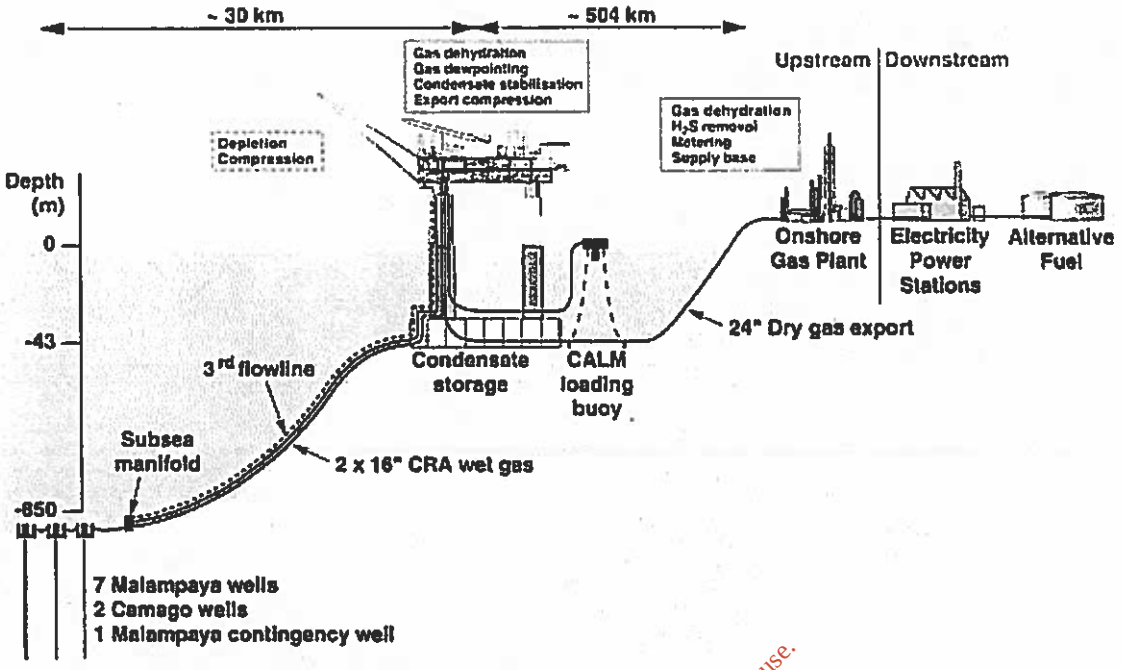
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Africa & Middle East Abana Gulf of Guinea, Nigeria Agbami Discovery Well, Nigeria Bonga Deepwater Project, Niger Delta, Nigeria Ceiba Gulf of Guinea, Equatorial Guinea Ekpe Phase II Gulf of Guinea, Nigeria Espoir Field, Ivory Coast Girassol Luanda, Angola Kizomba Deepwater Project, Angola Mossel Bay Bredasdorp Basin, South Africa Scarab and Saffron, Egypt South Pars Field, Iran Yoho Oil Field, Nigeria Zafiro Gulf of Guinea, Equatorial Guinea	**Central Asia** Blue Stream Natural Gas Pipeline, Russia Kashagan Caspian Sea, Kazakhstan Sakhalin II Sea of Okhotsk, Russia Shah Deniz South Caspian Sea, Azerbaijan **North Atlantic** Corrib Gas Field, Ireland, Republic of Foinaven West of Shetlands, UK Liverpool Bay Liverpool Bay, UK Rivers Fields, East Irish Sea, UK Schiehallion West of Shetlands, UK **South America** Barracuda and Caratinga Fields, Brazil Bijupira and Salema Fields, Brazil Espadarte Campos Basin, Brazil Marlim Oil Field - Campos Basin, Brazil Marlim Sul Campos Basin, Brazil PROCAP 2000 Campos Basin, Brazil Roncador Campos Basin, Brazil
Asia and the Pacific Rim Bayu-Undan Timor Sea, Australia Buffalo Timor Sea, Australia Gorgon Northern Carnarvon Basin, Australia Laminaria Timor Sea, Australia Langsa Oil Pool, Straits of Malacca, Indonesia Liuhua 11-1 South China Sea, China Lufeng 22-1 South China Sea, China Malampaya South China Sea, Philippines Stag North West Shelf, Australia Wonnich Carnarvon Basin, Australia	

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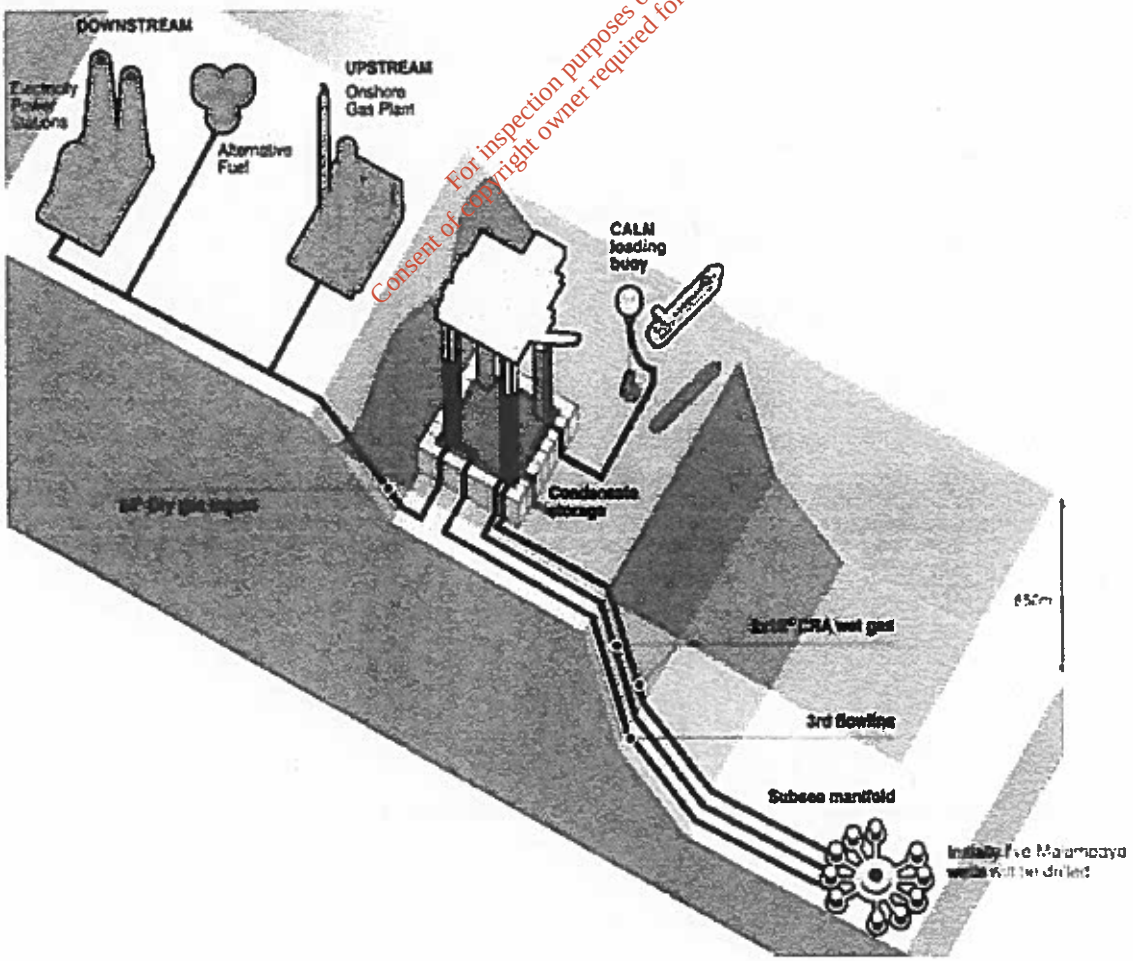
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MALAMPAYA SOUTH CHINA SEA, PHILIPPINES



Sectional Drawing of Malampaya Gas Works (Note its 504km to OnShore Terminal)

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3D View

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Location
The Malampaya field is located 80km off the coast of Palawan Island, in the Republic of the Philippines. In August 1998, Shell Philippines Exploration BV awarded Brown & Root a US$432 million design, procurement, fabrication, installation and commissioning contract.

PLATFORM
The platform consists of a deck, supported by a concrete gravity sub-structure (CGS). The processed gas will be compressed and exported through a 504km pipeline to the Batangas onshore facility at Luzon Island, in the Philippines.

The condensate will be stabilised on the topsides, stored in the CGS and then exported to a shuttle tanker, through a catenary anchored leg mooring (CALM) system, located 3km from the platform. The design capacity of the integrated CGS and deck is 508 million ft3 gas and 32,800bbl of stabilised condensate per day.
The platform is located in water 43m deep and the deepwater subsea wells are at a depth of 850m.

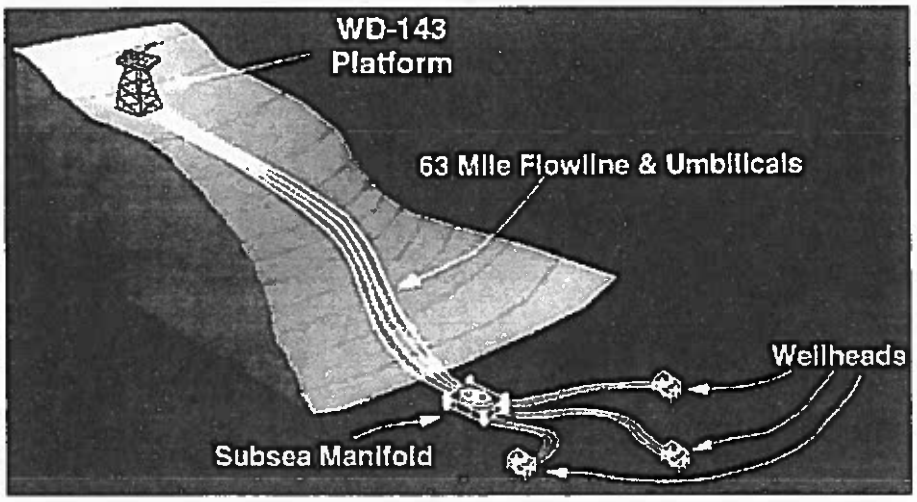
TOPSIDES
The topsides were subcontracted to Sembawang Marine & Offshore Engineering (SMOE). This contract involved the fabrication, onshore commissioning and load-out of a three-level integrated deck, together with a living quarters module that can accommodate up to 44 people.
The topsides measure 40x90m in plan and reach 25m, from the base of the cellar deck to the helideck.
The lower (cellar) deck, contains the major pumps, heavy wall vessels and workshops.
The middle deck (or production deck) contains the separation equipment and the electrical-control module. The equipment on the top deck (or weather deck) includes two export gas compressors, three power-generation gas turbines and a crane.
The initial operating weight of the topside is 13,000t. This equates to a loadout weight - excluding the transportation frame - of 10,000t and, as such, this will be the heaviest topside ever constructed by SMOE.
Fabrication of the deck commenced at Sembawang's yard, located in the north of Singapore, in June 1999 and is scheduled for completion and onshore testing by February 2001.

In December 2001, an extended well test of the thin oil rim beneath the field initially yielded about 8,000 barrels of oil per day (bpd). The well test was performed by the Atwood Falcon drilling rig and Stena Natalita floating storage unit. It is also believed to be the deepest horizontal subsea well test undertaken in the world at a depth of about 850m.

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MENSA GULF OF MEXICO, USA



Mensa is located 140 miles south-east of New Orleans and encompasses Mississippi Canyon blocks 686, 687, 730 and 731. The water is approximately 5,300ft deep.

DRILLING

The discovery well was drilled using Sonat's drillship, Discoverer Seven Seas. One delineation well has been drilled and two remaining production wells are also planned. They will be drilled by the Transocean semisubmersible, George Richardson.

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RESERVES

The target reserves are in the Upper Miocene 'J' sand, at a depth of approximately 15,500ft. The average net thickness is approximately 100ft. Ultimate recovery from the field is estimated at 720 billion ft3 of natural gas.
The first Mensa well produced approximately 108 million ft3 of gas per day. A peak production rate of 300 million ft3 of gas per day was achieved in the second quarter of 1998.

SUBSEA ARCHITECTURE

The subsea system consists of three wells, connected to a subsea manifold five miles away, which is in turn tied back via a 68-mile 12in flowline, to the shallow-water platform West Delta 143. This is the longest tieback in the world, beating the previous record of 30 miles, established by the Troll Oseberg Gas Injection Project, in the Norwegian sector of the North Sea.

SUBSEA MANIFOLD AND TEMPLATE BASE

The manifold/template base has four well-receiver slots and eight utility service slots, including hydraulic umbilicals, glycol injection and hydrate remediation.The template base is located on the seafloor. It is not connected by piling to the seafloor, but relies on its mass for stability. It has a diameter of 94ft, is 12.5ft tall and weighs about 200t.The manifold sits on the template base. This is a separate assembly, which can be recovered independently of the template. It has a diameter of 16ft, is 16ft tall and weighs about 50t.

ELECTRICAL DISTRIBUTION STRUCTURE (EDS)

The EDS is located near the subsea manifold. It takes electrical power and communications signals from the platform at West Delta 143, amplifies the signal (which decreases over the 63 miles from the platform to the EDS site), and distributes it to each of the subsea wells, five miles away.SUBSEA TREESThe three subsea trees provide the interface between the wellheads and the infield flowlines. The trees are of a 10,000psi composite block guidelineless design, with a vertical-flow piping connection mandrel for mating with the well jumper.

FLOWLINES

The flowlines transport the gas from the wells to the manifold, then on to the platform at West Delta 143. The three infield 6in flowlines are five miles long. They are made of carbon steel pipe and connected to the manifold with a stab and hingeover termination, and to the tree via a laydown sled and rigid

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jumper.The 12in interfield flowline is 63 miles long, made of carbon steel pipe and is connected to the manifold via a sled and jumper. It is connected to the West Delta 143 platform via risers.

UMBILICALS

The hydraulic umbilicals are constructed of carbon steel, with zinc coating. They supply the hydraulic fluid and chemical injection (glycol).There are three seven-line, five-mile infield hydraulic umbilicals and one three-line, 63-mile interfield hydraulic umbilical.The electrical umbilicals are double-armoured cable and transmit electrical power and signals between the master control station on the West Delta 143 platform and the electrical distribution structure. There are three five-mile, infield electrical umbilicals and one 63-mile interfield electrical umbilical.The 3in glycol supply line supplies glycol to the subsea manifold, where it is distributed to the various wells.

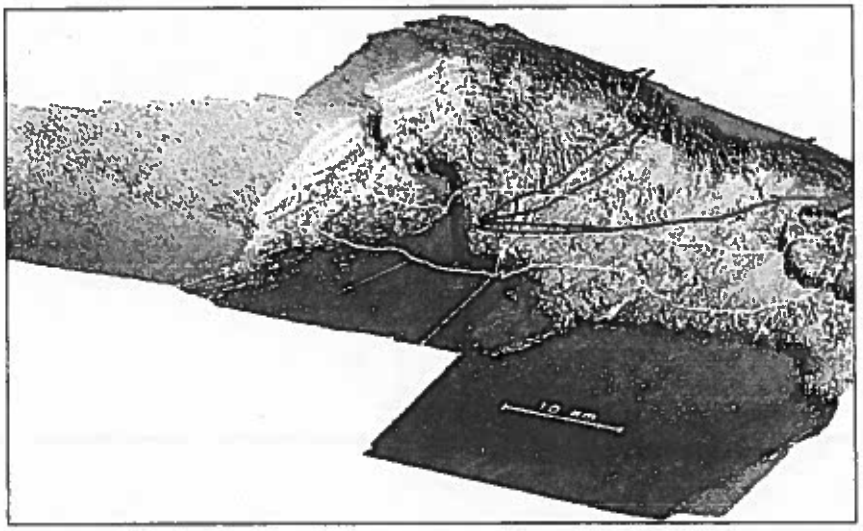
MASTER CONTROL STATION

Located on West Delta 143, this computer-based system monitors operational status of wells and other subsea equipment and has the capability to open and close the wells.

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ORMEN LANGE NORTH SEA NORTHERN, NORWAY



3D View (Note Vertical Cliff as the Line Approach the Shore Edge)

Ormen Lange is located in the Norwegian Sea, approximately 140km west of Kristiansund. The discovery lies across blocks 6305/4, 6305/5, 6305/6 and 6305/8. Preliminary estimates show that Ormen Lange is the second-largest gas discovery on the Norwegian shelf. The discovery well 6305/5-1 was drilled in 1997 and production is most likely to start in 2006.

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DISCOVERY

Hydro and Shell Norway signed an agreement for sharing responsibilities for the field. Norsk Hydro will be responsible for the development phase, while Shell will be responsible for developing the transport of the gas and all the commercial relationships.

Norske Shell	16 per cent (production operator)
Norsk Hydro Produksjon	14.78 per cent (drilling operator)
Statoil	8.87 per cent
State's Direct Financial Interest (SDFI)	45 per cent
BP Amoco Norge	9.44 per cent
Esso Norge	5.91 per cent

The main gas reserves lie in a reservoir in the Vale formation. Drilling has confirmed the original estimated resources of 315 billion m3 of natural gas.The difficulty in developing the field is due to the water depth and subsea topography. **The field lies in a depth of 800-1200m**, close to the steep back wall left by the Storegga submarine slide, which occurred 7,000-8,000 years ago.

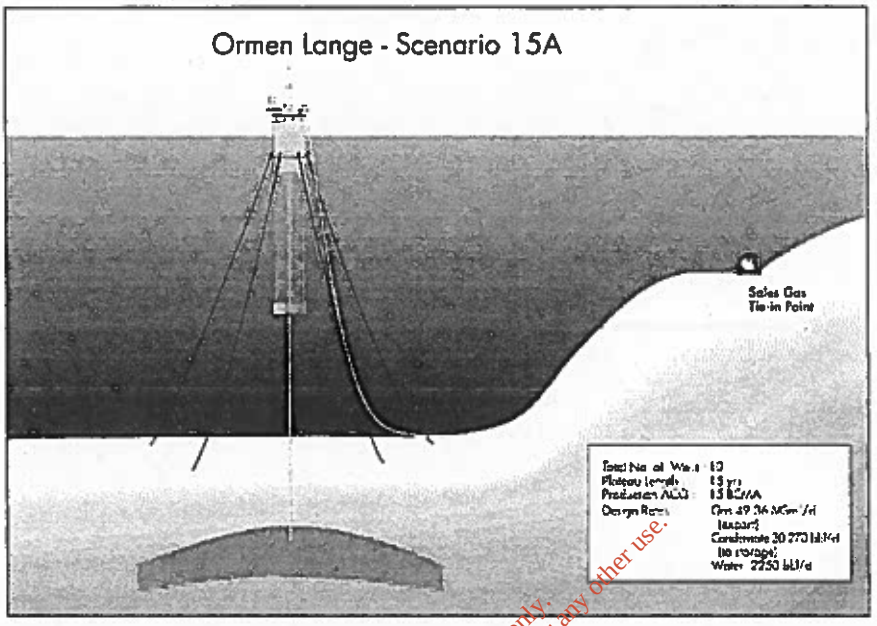
The Storegga slide was probably triggered by a major earthquake caused as the land masses rose at the end of the Ice Age, combined with weak sedimentary layers.Norsk Hydro has carried out a programme of high-resolution seismic surveys, seabed mapping, shallow coring and deep geotechnical drilling. This programme is also used to: evaluate large-scale margin stability, identify slide release mechanisms, evaluate the risk of new large and small slides, assess the consequences of possible reservoir subsidence as a result of production, evaluate possible measures to reduce risk in the event of a development, as well as map the seabed to identify good pipeline routes out of the slide area.

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DEVELOPMENT SCENARIOS

There are four potential development solutions, and a range of transport alternatives:

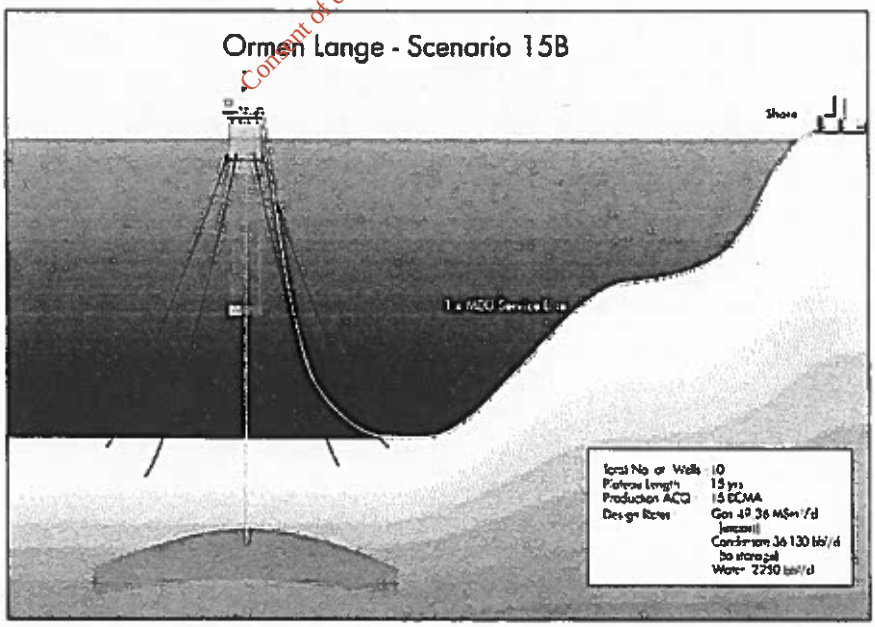
SCENARIO 15A



Scenario 15a consists of a spar moored to the seabed. Ten wells feed into the platform and the hydrocarbons are exported through a pipeline running to a subsea sales gas tie-in point. The design specifies exporting gas at a rate of 49.36M m3/day and storing up to 30,270b/d of condensate. The facilities can also process 2,250b/d of water.

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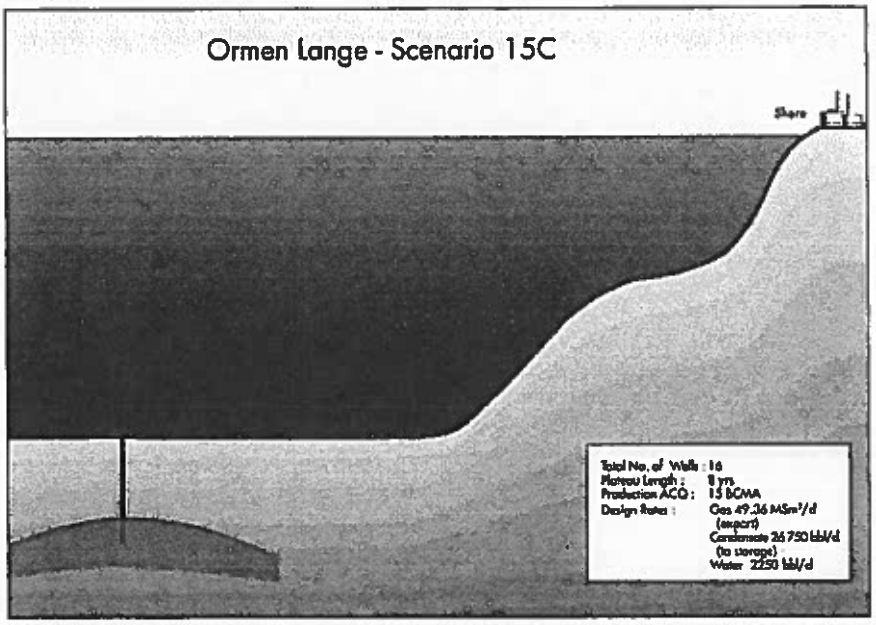
SCENARIO 15B



Scenario 15b is broadly similar to 15a, except that it will be developed using ten wells tied into a subsea template, then piped directly to the shore. The plateau production will be 15 years. The maximum gas- and water-production rates are the same as with 15a, but the storage specified is 36,130b/d.

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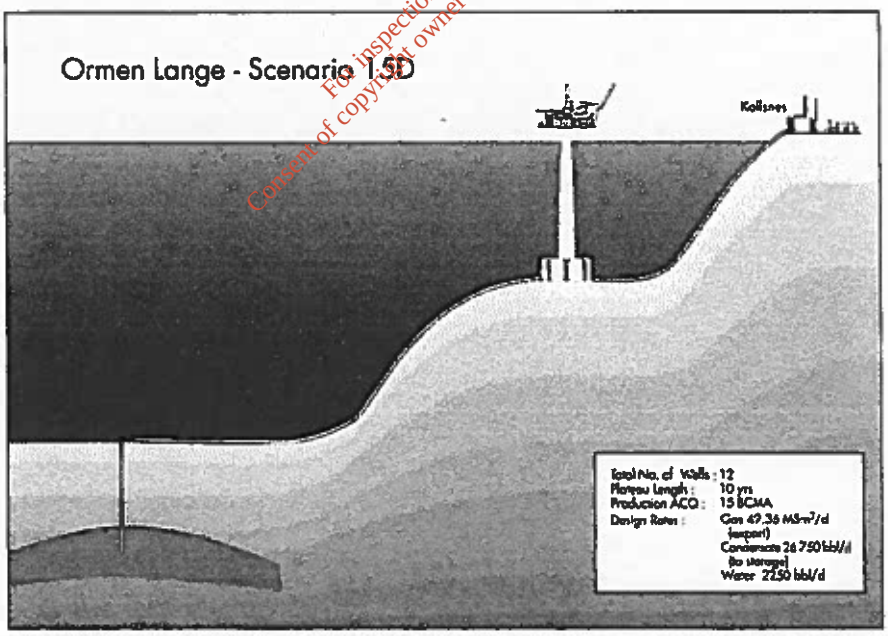
DEVELOPMENT SCENARIOS (cont.)
SCENARIO 15C



This scenario produces Ormen Lange as a subsea completion, tied back to the shore. It would be developed using 16 wells and stay on plateau production for eight years. The gas export and water production would remain at 49.36M m3/day and 2,250b/d, respectively, but 26,750b/d of condensate would be sent for storage.

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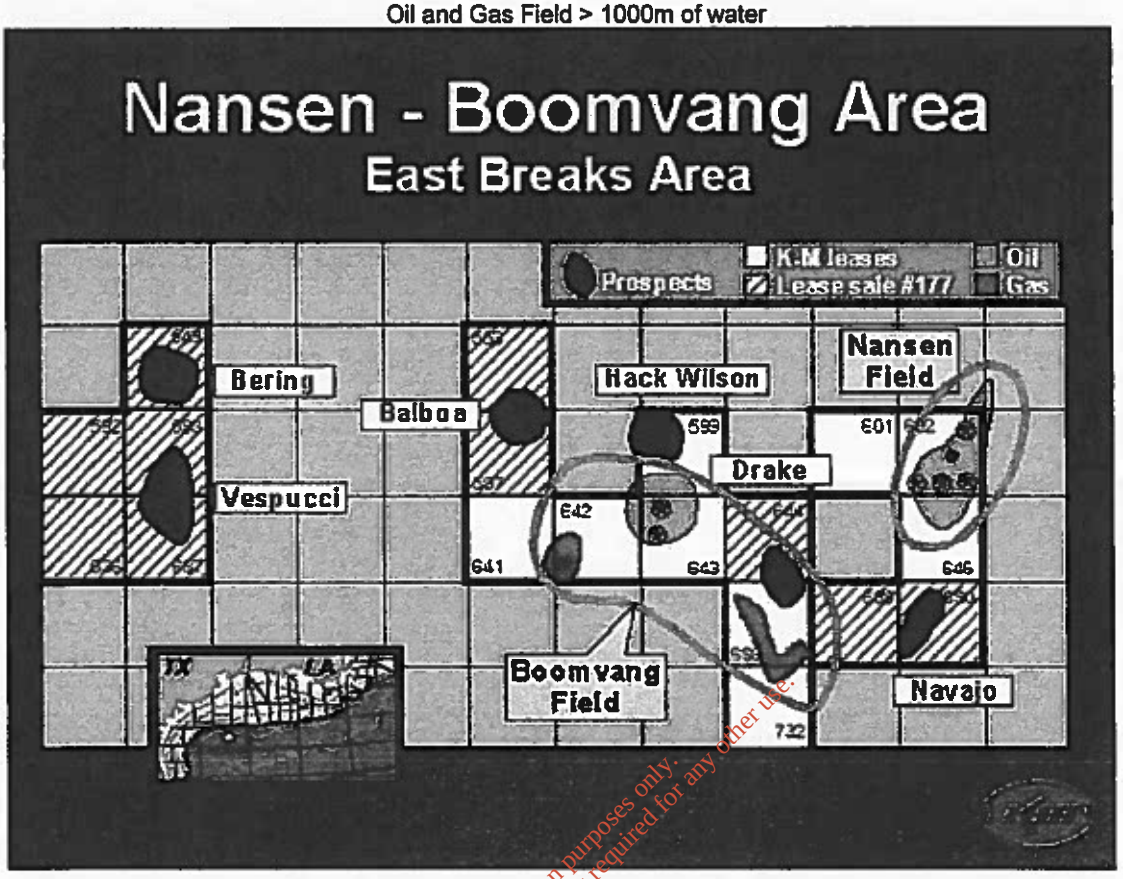
SCENARIO 15D



This envisages 12 wells being produced into a subsea template and piped to a concrete platform. Production would then be sent to the plant at Kollsnes. It would stay on plateau production for ten years. The gas export and water production would remain at 49.36M m3/day and 2,250b/d respectively, but 26,750b/d of condensate would be sent for storage. In August 2000, the extension well 6305/8-1 confirmed gas volumes and a thin layer of oil, measuring a maximum of three metres. Norsk Hydro drilled the well into a chalk formation to a total depth of 3,175m, using the rig Scarabeo 5.

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NANSEN BOOMVANG GAS FIELD, GULF OF MEXICO, USA
Oil and Gas Field > 1000m of water



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The Nansen and Boomvang fields lie in the East Breaks area of the Gulf of Mexico, approx. 150 miles south of Houston. Nansen lies in East Breaks block 602 and Boomvang lies in blocks 642, 643 and 683. Nansen lies in 3,678ft of water, while Boomvang lies in 3,453ft.

EQUITY
Kerr McGee operates the Boomvang field with a 30% working interest and the Nansen field with a 50% working interest. The other partners in Boomvang are Enterprise (now Shell - 50%) and Ocean Energy (20%). Ocean Energy holds the remaining 50% interest in the Nansen field.

DRILLING
Nansen was discovered in October 1999, in 3,680ft of water, approx. eight miles east of the previously announced North Boomvang discovery. Successful drilling of Nansen No 8 well, on East Breaks 602, extended the field to the south. At Boomvang, a second rig was secured to concurrently drill a total of up to seven wells at North and East Boomvang.

DEVELOPMENT
In Early 2002, Nansen achieved first production from the first of three subsea wells. Daily production from the Nansen field ramped up to a peak rate of about 40,000 barrels of oil and 80 million cubic feet of gas by the fourth quarter of 2002, as completion activities at the remaining nine dry tree wells were completed. Both Nansen and Boomvang are being developed by the world's first truss spars. Spars International was contracted to design the almost identical systems. The truss design replaces the lower cylindrical hull in order to reduce weight and cost. The open truss structure also reduces movement and three heavy plates enhance stability. The Spars are 543ft in length and weigh 17,000t each. Air chambers in the upper hull provide buoyancy for the floating structures.Each spar has a production capacity of 40,000b/d and 200 million ft^3/day of gas. The wells were completed beneath the spar and tied back through top-tensioned risers to dry wellheads and trees. Additional tie-ins are incorporated from subsea satellite wells. In total, there are nine top-tensioned production risers and associated equipment for Nansen and five for Boomvang.GAS

EXPORT
Williams constructed and operates the Seahawk Gathering System which moves all gas produced from Nansen and Boomvang. The Seahawk construction project includes 41 miles of 18in diameter line,

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connecting the spar platforms to a new shallow-water facility on the shelf in GAA-244. From there, a 55-mile, 24in-diameter pipeline has been laid for exporting the gas to an interconnection on Williams' Central Texas Gathering System in BA538.

OIL EXPORT

Williams constructed and operates the Boomvang and Nansen Joint Oil (BANJO) System to move all the oil. BANJO is a 16in diameter, 41 mile-long oil-export pipeline that extends from the Spar platforms to the shallow-water facility in GAA-244. From there it interconnects with ExxonMobil's Hoover Offshore Oil Pipeline System. Both the Seahawk and BANJO Systems include deepwater subsea junction facilities for gathering oil and gas from future deepwater.

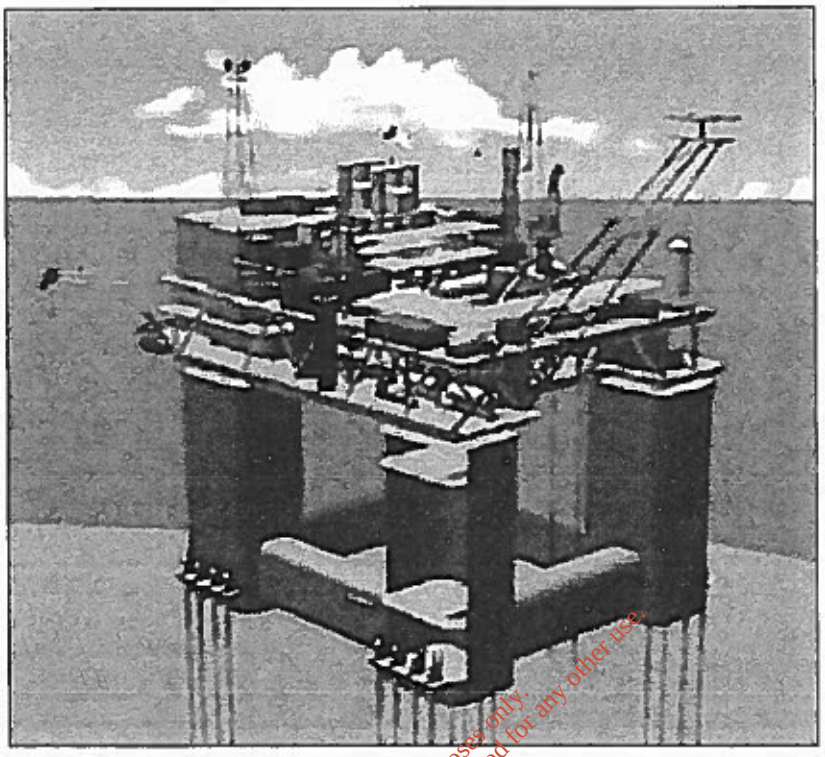
PIPELINE

The main pipeline was subcontracted by Williams to Coflexip Stena. The company used its CSO Deep Blue newbuild. Cal Dive International installed infield flowlines using its reeled pipelay system deployed from the Sea Sorceress. Workscope covered the installation of approximately 100,000ft of 6in-diameter pipelines, five flexible production risers and 86,000ft of associated umbilicals, plus the jumpers and flying leads necessary to tie-in three subsea trees.Wellstream designed and supplied the 5.625in, 6,000psi flexible pipe production risers and tie-in jumpers for the project. The risers were installed in a catenary configuration, enabling the spars to be offset for future on-site drilling. Bridon supplied HDPE sheathing on the wire spiral strand to be used for the spar moorings.

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PROCAP 2000 CAMPOS BASIN, BRAZIL



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To enable PETROBRAS to produce oil and gas from offshore fields situated in **ultra deep waters** (of **1,000-3,000m**), with the aim of incorporating the reserves located at these water depths, Petrobras set up the PROCAP 2000 project. This project targets the pilot trial of a subsea multiphase pumping system and a subsea multiphase metering system.

DRILLING AND COMPLETION TECHNIQUES

The two main topics were concerned with underbalanced drilling and high-pressure jet drilling.

SUBSEA SEPARATION SYSTEMS

The objective was to decrease the well-head backpressure, by separating the gas and the liquid phases at the seabed, as near as possible to the production well. This project is based on a vertical annular separation and pumping system (VASPS) subsea separation system.

HIGHLY DEVIATED WELLS IN UNCONSOLIDATED LITHOLOGIES

The aim of the project was to develop studies and tools for a better understanding of well instability, thus minimising its effect by guaranteeing cuttings removal. The problems relating to mechanical stability and cuttings removal are very well connected, as both are physically related. Due to the collapse of the formation, the cuttings fall into the well in great volumes.

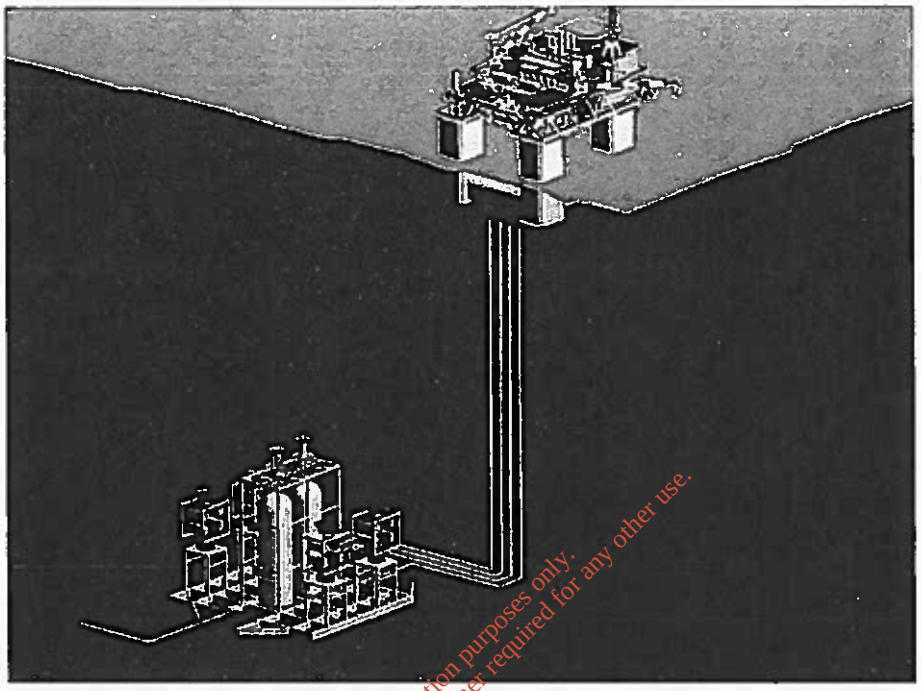
STABILITY IN HORIZONTAL AND DEVIATED WELLS

The major concern has largely been restricted to poorly consolidated formations; perforated completions subjected to excessive drawdown; and wellbores intersecting tectonically active zones.

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DEEPWATER SUBSEA EQUIPMENT

The main target is to promote the development of flexible pipes, accessories and installation procedures for water depths up to 3,000m, so as to evaluate and validate new flexible pipe design criteria and new material applicability. The sub-projects include horizontal christmas trees for water 2,500m deep; a drill pipe riser for ultra deep water; alternatives for drilling risers; slender wells for ultra-deep water; the shared actuator manifold - MacManifold; pig operation devices; and integrated system subsea equipment for the RJS396 area.



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KICK AND BLOWOUT CONTROL IN DEEPWATER WELLS

The objectives are the development of theoretical and experimental studies, for helping in the definition of adequate well-control procedures, to minimise the possibility of blowouts. Considering the risks associated with gas influx control, early kick detection is a key factor.

MOORING SYSTEM

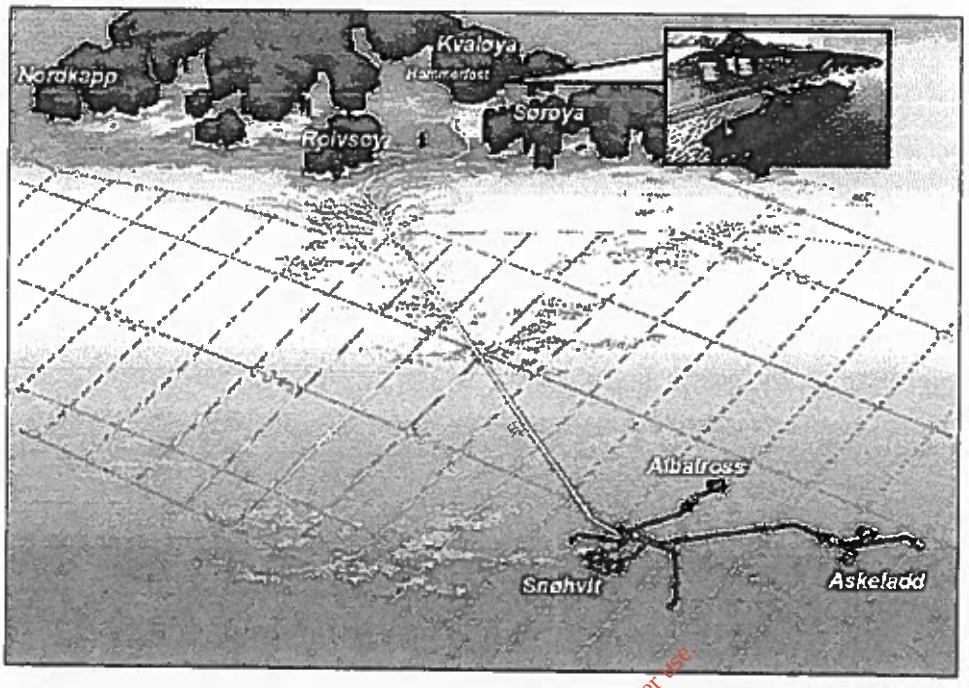
The aim of this project is to develop technology to moor drilling, production and off-loading systems in water depths down to 3000m.

PRODUCTION UNITS WITH DRY COMPLETION

This will make available the Spar Buoy and TLP conceptual design for water depths from 1,000-3,000m, as well as evaluating the possibility of the SPAR to accommodate oil storage, identifying possible limitations.

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SNØHVIT GAS FIELD, BARENTS SEA, NORWAY



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The Snøhvit development comprises three fields - Snøhvit, Albatross and Askeladd. These lie in the Barents Sea, about **140km** north-west of Hammerfest in northern Norway. The fields were discovered in 1984 in **250-345m of water** and extend across seven production licences. It is operated by Statoil on behalf of Petoro, TotalFinaElf, Gaz de France, Norsk Hydro, Amerada Hess, RWE Dea and Svenska Petroleum Exploration. **All primarily contain natural gas** with small quantities of condensate. The accumulation exceeds 193 billion cubic metres of natural gas and 113 million barrels of condensate.

Snøhvit will be the first major development on the Norwegian continental shelf without a fixed or floating unit. Instead, a subsea production system on the seabed will feed a land-based plant on the north-western coast of Melkøya, at the entrance to the shipping channel into Hammerfest via a 68cm ID, 160km gas pipeline. In addition come two chemical lines, an umbilical and a separate pipeline for transporting carbon dioxide, which will be laid in the summer of 2005. Both the subsea production system located on the field and pipeline transport will be monitored and controlled from a control room at Melkøya, where operators will be able to open and close valves on the seabed 140km away with signals transmitted along fibre-optic cables, and with high-voltage electrical and hydraulic power lines.

The potential routes for the pipelines and cables have been mapped, as well as the areas where the subsea installations are to be sited in order to ensure the most favourable location for pipelines and equipment.

The work was carried out from the Normand Tonjer, which was followed by geotechnical surveys on the field and along the pipeline routes by the ship Bucentaur.

GAS LIQUEFACTION

The unprocessed wellstream arriving at Melkøya is separated and the gas cooled down to liquid form and exported. Gas from the Snøhvit area contains five-eight per cent carbon dioxide, which will be separated out at the land plant and returned in a separate line for storage underground beneath the seabed.A liquefaction plant will reduce its volume 600-fold by decreasing its temperature to -163°C. This will be carried out on a gas liquefaction barge, being built at the Spanish shipyard group Izar Construcciones Naval's yard in Ferrol in a contract worth about NOK 170 million. The barge will measure 9m high by 154m long and 54m wide.The chosen building approach greatly reduces the need for steelwork on Melkøya, and gives cost savings as well as higher productivity compared with constructing the plant on site.

Following completion, the barge will be towed to an outfitting yard where about 24,000t of process equipment for the gas liquefaction plant will be installed on its deck. From there, it will then be transported to Melkøya on a heavy-lift ship and installed in a dock blasted out in advance. About 70 cargos of LNG per year will be shipped out from Melkøya.

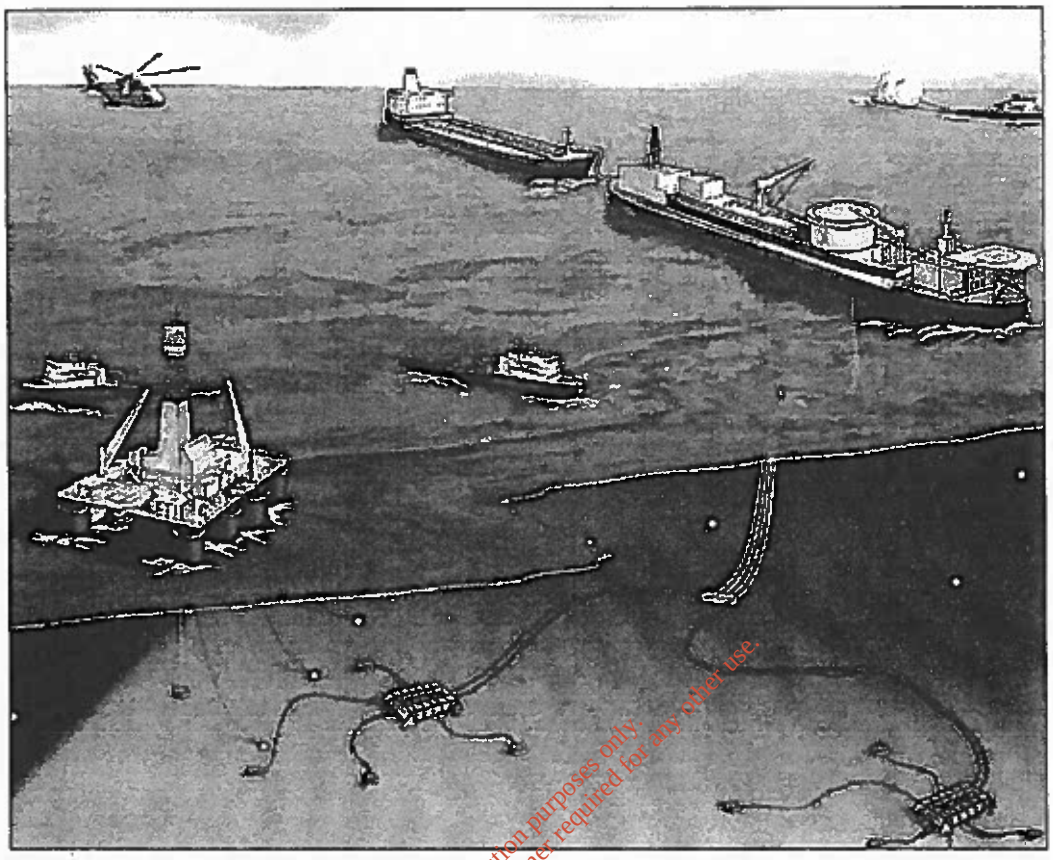
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The annual exports are anticipated to be 5.75 billion cubic metres of LNG, 747,000t of condensate and 247,000t of liquefied petroleum gases (LPG). There are long-term contracts with Iberdrola in Spain and El Paso in the USA. The total investment will include NOK 34.2 billion for field development, pipeline and land plant and NOK 5.4 billion for ships. Snøhvit will start production in 2006.

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TERRA NOVA GRAND BANKS, CANADA



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Note
Same Process can now be done by producing Liquid Natural Gas (LNG) by GAS LIQUEFACTION similar to the SNØHVIT GAS FIELD,in Norway

The Terra Nova field, located 350km ESE of St John's Newfoundland and 35km SE of Hibernia, was discovered in 1984 by Petro-Canada. Field reserves have been estimated at 406 million barrels (Mbbl).

ENVIRONMENT
Water depths are shallow - between 90m and 100m. The mean annual wind speed is 35kmph, with the strongest recorded wind speed being 145kmph and the largest recorded wave height being 25m.The area is characterised by the seasonal presence of floating sea ice, ranging in thickness from 0.5m to 1.5m, produced by the freezing of the ocean's surface layer and icebergs.

RESERVOIR
Terra Nova is subdivided into three major structural blocks: the Graben, the East Flank and the Far East. The field is estimated to contain over one billion barrels of oil in place, of which about 400Mbbl of oil are recoverable. (The Far East block, which is not yet drilled, is expected to add at least 100Mbbl of reserves to the 300Mbbl that have already been estimated within the Graben and East Flank). The estimated peak production rate is 125,000b/d from the Graben and East Flank portions alone. A total of 32 wells are planned for the Graben and East Flank blocks, including 20 production wells, ten water-injection wells and two gas injection wells. For the Far East, a total of 12 wells are planned, including six production wells and six injection wells. Field life is expected to be 18 years.

DEVELOPMENT
Petro-Canada selected the Grand Banks Alliance (SBR Offshore, Doris Conpro, PCL Industrial Constructors, Coflexip Stena, Halliburton Canada and FMC Canada) to carry out engineering, procurement, construction, installation, commissioning and possibly pre-development drilling activities up to the production of first oil. The project partners and Grand Banks Alliance consequently established a single alliance: the Terra Nova Alliance, with each company participating on a risk-and-reward basis.

PRODUCTION
The subsea layout will consist of a production well feeding into a template, which, in turn, will be connected by flexible flowlines to a riser-base manifold (RBM). In order to protect the subsea wells from

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iceberg scour, they will be set in glory holes - large holes drilled in the seabed in which equipment can be installed. Flexible risers will connect the RBM to an FPSO. The vessel will have a length of 280m and a width of 45m. The combination of low air and water temperatures with wind and wave action, makes superstructure icing a consideration during the winter months. This means that an allowance of several hundred tonnes of superstructure ice accumulation must be factored into weight and stability calculations. There must also be procedures for monitoring and mechanisms for controlling ice build-up on the structure and substructures of the offshore facilities.Low water temperatures require that fluids such as hydraulic control fluids be heated or treated to lower their freezing point. Similarly, low temperatures combined with the waxy nature of the crudes require that the flowlines and riser are insulated to reduce wax deposition. The FPSO is designed to operate in moderate sea ice, up to a limit of five-tenths coverage and to disconnect, as required, to avoid heavy pack ice and potential collisions with icebergs.The 9000t topsides facilities will be installed approximately 4.5m above the main deck. They will contain the necessary equipment to produce 150,000b/d oil, and inject 250,000bbl of seawater/day and 125 MMcf/d of gas. The FPSO hull will have an integrated storage capacity of 900,000bbl.

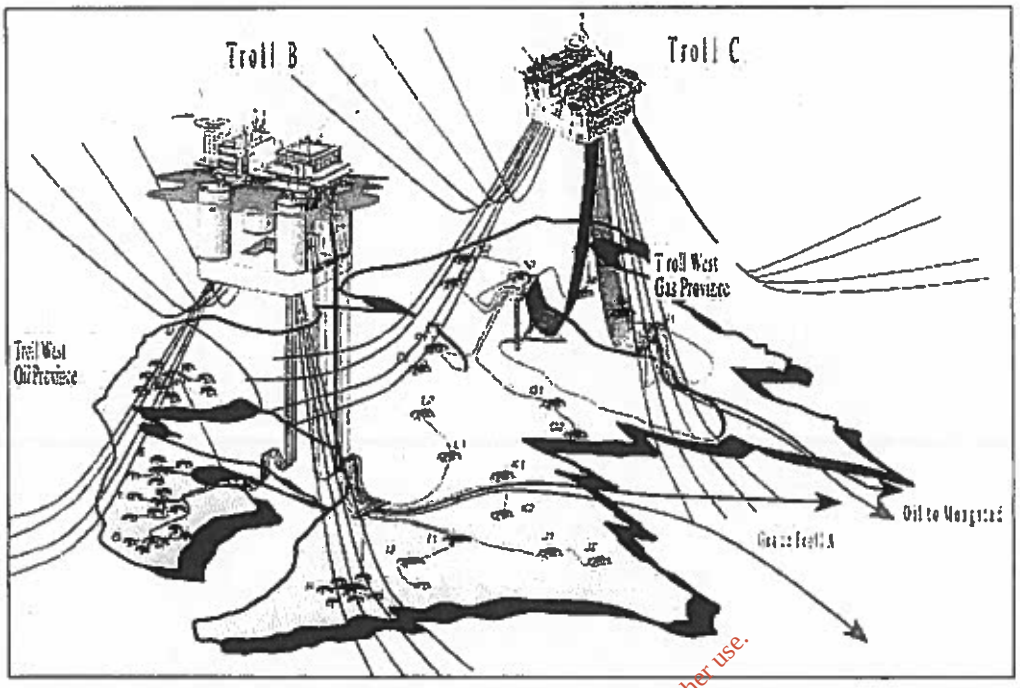
EXPORT

The export system will be a tandem offloading system for the transfer of crude oil from the storage tanks of the FPSO to ice-strengthened shuttle tankers, ranging in weight from 80,000t to 120,000t. The offloading system will be designed for connection to tankers in 5m significant-wave-height conditions.

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TROLL WEST NORTH SEA NORTHERN, NORWAY



Although Troll is primarily a gas field, it also possesses significant quantities of oil, in thin zones under the gas cap, to the west of the field. West Troll can be divided into two major zones - the Troll West oil province and the Troll West gas province. Regular oil production from the 22- to 26m-thick reservoirs, in the Troll West oil province, began in late 1995. Now, the extensive use of advanced drilling technology and the experience of production and well management have allowed the development of the Troll West gas province to begin - where zones are only 12 to 14m thick.

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TROLL WEST LOCATION

The field is located in blocks 31/2 and 31/5, within production licence 85. **It lies approximately 75km from the shore** and 32km from the Troll A platform. The water depth ranges from 315-345m.

DISCOVERY

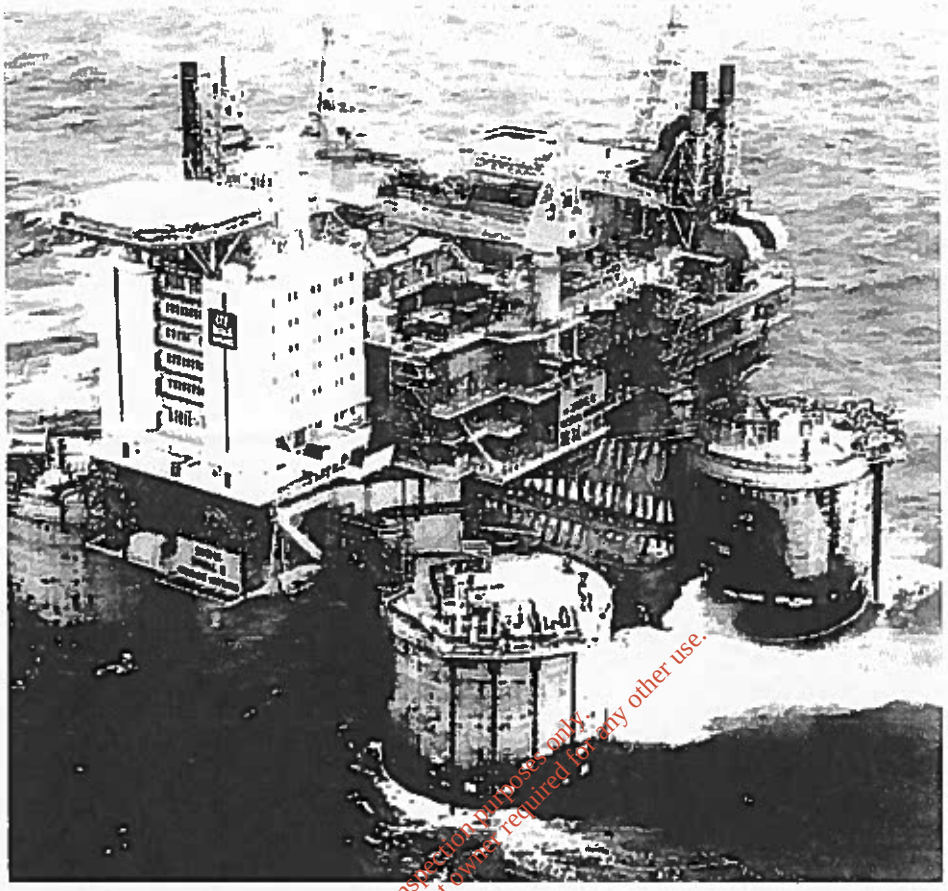
Oil and gas were discovered by well 31/2-1 in 1979. This was followed by the drilling of 20 appraisal wells between 1980-93, all of which encountered quantities of oil and gas. In 1990, the horizontal test well 31/2-T1 was drilled in the oil province and this was followed, in 1991, by the horizontal test well 31/5-T 1 in the gas province.

DEVELOPMENT STRATEGY

The Troll West reservoirs are being drained by two platforms, Troll B and Troll C. These are both semisubmersible production units. Since it came on-stream, Troll B has been used to produce oil from the oil province and the southern part of the gas province. When it came on-stream in late 1999, Troll C started to deplete the Northern part of the gas province.

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TROLL B - OIL PROVINCE



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Production commenced on Troll B in September 1995, using eight predrilled wells in the oil province. Current production is 40,000-42,500m3/day, from 21 wells, in the four oil province well groups known as D, E, F and G. TROLL B –

GAS PROVINCE

The platform has also brought wells from the south part of the gas province on-stream. Altogether, there are 24 subsea satellite oil producers tied back to the Troll B platform - 12 wells are in the H-cluster and 12 in well group 1.

FUTURE PLANS

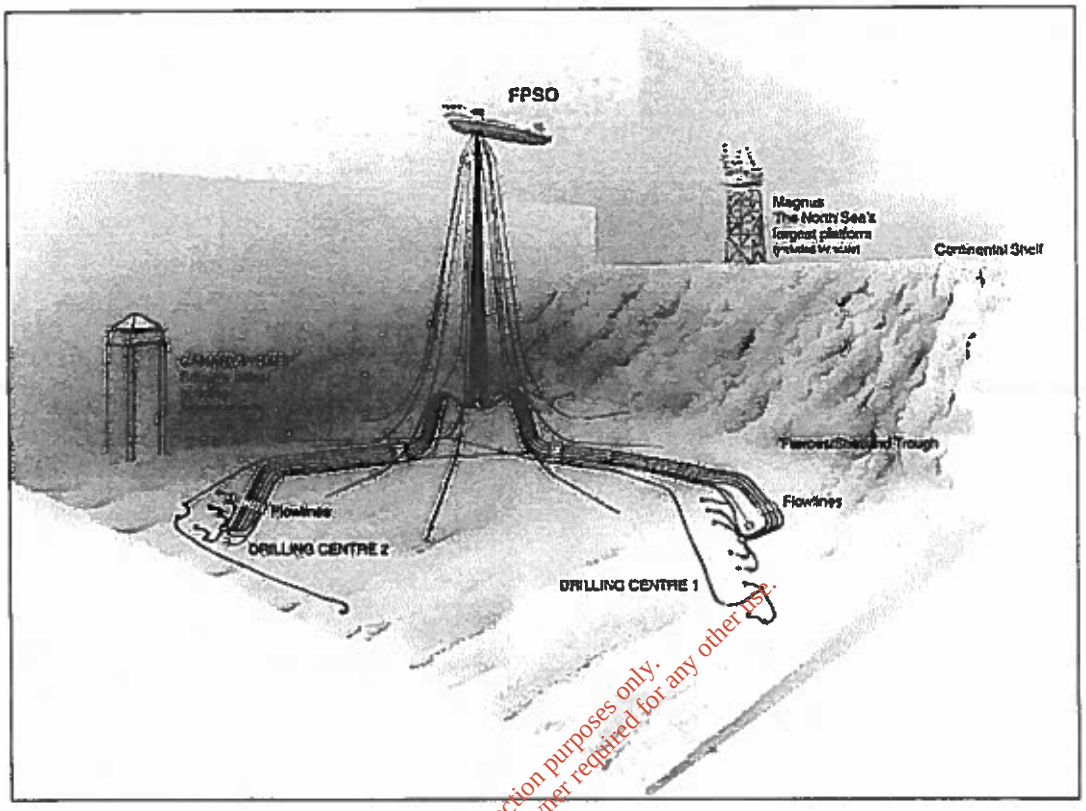
The remaining oil reserves of the gas province will be developed by 58 horizontal wells. Plans envisage that 14 of these will be drilled with two branches. These 58 wells will be arranged in ten well groups, each normally containing two templates. Between two and four wells will be drilled from each template. Three of these well groups - J, K and L, which will contain a total of 18 wells - will also be tied back to Troll B and use the spare tie-in capacity on the platform.

TROLL C

The remaining seven well groups will be routed to a new Troll C platform, which is located in the Northern part of the gas province. There will be no drilling facilities on Troll C. In early 1998, a second rig started pre-drilling wells in the gas province. Production from this part of the field commenced in late 1999. The drilling programme is planned for completion by the year 2002, but it may be extended, in order to find out the potential for improved oil recovery. Troll C has an oil-production capacity of 30,000m3/d, a water production capacity of 40,000m3/day, a liquid production capacity of 60,000m3/d and associated gas production capacity of 9 million m3/d. It has a total displacement of 52,750t and can accommodate 70 people.

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FOINAVEN WEST OF SHETLANDS, UNITED KINGDOM



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Note
Same Process can now be done by producing Liquid Natural Gas (LNG) by GAS LIQUEFACTION similar to the SNØHVIT GAS FIELD,in Norway

Foinaven is located in blocks 204/19 and 204/24a, which are operated by BP Exploration. Shell UK Exploration and Production is the co-venturer. These blocks lie some 190km west of the Shetland Islands, in a water depth of between 400 and 600m.

Recoverable reserves are estimated to be in the region of 250 to 600 million barrels of oil. The project is being carried out as a phased development. The first of these is based on the recovery of 200 millions barrels within the Foinaven field.

These developments centre on subsea wells completed on the seabed. They produce oil, via a manifold, which passes through rigid flowlines and then flexible risers into a floating production, storage and offloading system (FPSO), which is permanently stationed in the field. Shuttle tankers then export the crude oil.

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Appendix B

SCANNED

EXTRACTS FROM THE

SEVESO II DIRECTIVE (96/82/EC)

EU GAS DIRECTIVE

Foreshore Act

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Seveso II Directive [96/82/EC]

Article 1

Aim

This Directive is aimed at the prevention of major accidents which involve dangerous substances, and the limitation of their consequences for man and the environment, with a view to ensuring high levels of protection throughout the Community in a consistent and effective manner.

Article 2

Scope

1. The Directive shall apply to establishments where dangerous substances are present in quantities equal to or in excess of the quantities listed in Annex I, Parts 1 and 2, column 2, with the exception of Articles 9, 11 and 13 which shall apply to any establishment where dangerous substances are present in quantities equal to or in excess of the quantities listed in Annex I, Parts 1 and 2, column 3.

For the purposes of this Directive, the 'presence of dangerous substances' shall mean the actual or anticipated presence of such substances in the establishment, or the presence of those which it is believed may be generated during loss of control of an industrial chemical process, in quantities equal to or in excess of the thresholds in Parts I and 2 of Annex I.

2. The provisions of this Directive shall apply without prejudice to Community provisions concerning the working environment, and, in particular, without prejudice to Council Directive 89/391/EEC of 12 June 1989 on the introduction of measures to encourage improvements in the safety and health of workers at work([1]).

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Article 3

Definitions

For the purposes of this Directive:

1. 'establishment' shall mean the whole area under the control of an operator where dangerous substances are present in one or more installations, including common or related infrastructures or activities;
2. 'installation' shall mean a technical unit within an establishment in which dangerous substances are produced, used, handled or stored. It shall include all the equipment, structures, pipework, machinery, tools, private railway sidings, docks, unloading quays serving the installation, jetties, warehouses or similar structures, floating or otherwise, necessary for the operation of the installation;

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3. 'operator' shall mean any individual or corporate body who operates or holds an establishment or installation or, if provided for by national legislation, has been given decisive economic power in the technical operation thereof;
4. 'dangerous substance' shall mean a substance, mixture or preparation listed in Annex 1, Part 1, or fulfilling the criteria laid down in Annex 1, Part 2, and present as a raw material, product, by-product, residue or intermediate, including those substances which it is reasonable to suppose may be generated in the event of accident;
5. 'major accident' shall mean an occurrence such as a major emission, fire, or explosion resulting from uncontrolled developments in the course of the operation of any establishment covered by this Directive, and leading to serious danger to human health and/or the environment, immediate or delayed, inside or outside the establishment, and involving one or more dangerous substances;
6. 'hazard' shall mean the intrinsic property of a dangerous substance or physical situation, with a potential for creating damage to human health and/or the environment;
7. 'risk' shall mean the likelihood of a specific effect occurring within a specified period or in specified circumstances;
8. 'storage' shall mean the presence of a quantity of dangerous substances for the purposes of warehousing, depositing in safe custody or keeping in stock.

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Article 4

Exclusions

This Directive shall not apply to the following:

a. military establishments, installations or storage facilities;
b. hazards created by ionizing radiation;
c. the transport of dangerous substances and intermediate temporary storage by road, rail, internal waterways, sea or air, outside the establishments covered by this Directive, including loading and unloading and transport to and from another means of transport at docks, wharves or mashalling yards;
d. **the transport of dangerous substances in pipelines, including pumping stations, outside establishments covered by this Directive;**
e. the activities of the extractive industries concerned with exploration for, and the exploitation of, minerals in mines and quarries or by means of boreholes;
f. waste land-fill sites.

Article 12

Land-use planning

1. Member States shall ensure that the objectives of preventing major accidents and limiting the consequences of such accidents are taken into account in their land use policies and/or other relevant policies. They shall pursue those objectives through controls on :

a. the siting of new establishments,
b. modifications to existing establishments covered by Article 10,
c. new developments such as transport links, locations frequented by the public and residential areas in the vicinity of existing establishments, where the siting or developments are such as to increase the risk or consequences of a major accident.

Member States shall ensure that their land-use and/or other relevant policies and the procedures for implementing those policies take account of the need, in the long term, to maintain appropriate

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distances between establishments covered by this Directive and residential areas, areas of public use and areas of particular natural sensitivity or interest, and, in the case of existing establishments, of the need for additional technical measures in accordance with Article 5 so as not to increase the risks to people.

2. Member States shall ensure that all competent authorities and planning authorities responsible for decisions in this area set up appropriate consultation procedures to facilitate implementation of the policies established under paragraph 1. The procedures shall be designed to ensure that technical advice on the risks arising from the establishment is available, either on a case-by-case or on a generic basis, when decisions are taken.

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EU Gas Directive 98/30/EC

SCOPE AND DEFINITIONS

Article 1

This Directive establishes common rules for the transmission, distribution, supply and storage of natural gas. It lays down the rules relating to the organisation and functioning of the natural gas sector, including liquefied natural gas (LNG), access to the market, the operation of systems, and the criteria and procedures applicable to the granting of authorisations for transmission, distribution, supply and storage of natural gas.

Article 2

For the purposes of this Directive:

1. 'natural gas undertaking' means any natural or legal person carrying out at least one of the following functions: production, transmission, distribution, supply, purchase or storage of natural gas, including LNG, which is responsible for the commercial, technical and/or maintenance tasks related to those functions, but shall not include final customers;

2. 'upstream pipeline network' means any pipeline or network of pipelines operated and/or constructed as part of an oil or gas production project, or used to convey natural gas from one or more such projects to a processing plant or terminal or **final coastal landing terminal**;

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DISTRIBUTION AND SUPPLY

Article 9

1. Member States shall ensure that distribution undertakings act in accordance with Articles 10 and 11.

2. Member States may impose distribution undertakings **and/or supply undertakings, an obligation to deliver to customers located in a given area or of a certain class or both. The tariff for such deliveries may be regulated, for instance to ensure equal treatment of the customers concerned.**

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Extracts from Foreshore Act 1933

Section 3

Power for Minister to grant licences of foreshore.

3.—(1) If, in the opinion of the Minister, it is in the public interest that a licence should be granted to any person in respect of any foreshore belonging to Saorstát Eireann authorising such person to place any material or to place or erect any articles, things, structures, or works in or on such foreshore, to remove any beach material from such foreshore, to get and take any minerals in such foreshore and not more than thirty feet below the surface thereof, or to use or occupy such foreshore for any purpose, the Minister may, subject to the provisions of this Act, grant by deed under his official seal such licence to such person for such term not exceeding ninety-nine years commencing at or before the date of such licence, as the Minister shall think proper.

(2) Every licence granted under this section shall (unless the Minister is of opinion that such licence should in the public interest be granted free of any payment) be granted subject to the payment to the Minister of such moneys, whether by way of fine or other preliminary payment or by way of rent or other periodical payment or by way of royalty on material removed or by all or any of such ways, as the Minister shall think proper and shall agree upon with the person to whom such licence is granted.

(3) Where, in the opinion of the Minister, a licence proposed to be granted under this section is, owing to its nature, duration, or otherwise, of a trivial character and should be granted without payment or subject to a nominal payment only, such licence may, notwithstanding anything contained in this section, be granted by way of permission in writing signed by the Minister or one of the principal officers of his Department.

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(4) Notwithstanding anything contained in this section, no licence requiring payment by the licensee of a rent or other annual payment exceeding ten pounds a year shall be granted under this section without the sanction of the Minister for Finance.

(5) Every licence granted under this section shall contain a power to the Minister to terminate such licence on breach, non-performance, or non-observance by the licensee of any covenant on the licensee's part (including a covenant for payment of rent, royalty or other money), condition or agreement contained therein.

(6) No licence granted under this section shall contain any covenant or agreement for the renewal of such licence.

(7) Every licence granted under this section shall (subject to the provisions of this section) contain such covenants, conditions, and agreements as the Minister shall consider proper or desirable in the public interest and shall agree upon with the person to whom such licence is granted.

(8) No licence granted under this section shall extend to or authorise the removal of any minerals lying more than thirty feet below the surface of the foreshore to which such licence relates.

(9) Whenever an application is made to the Minister for the grant of a licence under this section, the Minister may, if he thinks fit, hold a public inquiry in regard to the granting of such licence.

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Appendix C

News Extracts

Of

Recent

Gas Explosions.

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Last Update: Monday, December 29, 2003. 8:24am (AEDT)
Death toll from China Gas Blast jumps to 233

The death toll from a natural gas well blowout in south-west China has climbed to 233 as rescue workers began cleaning up a vast "**death zone**", the official Xinhua news agency said.

Medical workers were disinfecting eight villages, testing drinking water and poisoned crops near the site of the leak, a gas field in Chongqing municipality, Zhang Mingkui, director of the Kaixian County Bureau of Environmental Protection, said.

About **42,000 people** were evacuated after the blow-out on Tuesday. Some began returning home over the weekend.

Newspapers and Internet portals showed pictures of villagers in trucks on their way home but locals, whose houses lie within five kilometres of the leak, were not allowed to return.

"I want to clean up my house and count my losses because we can't smell the fumes now," Xinhua quoted a farmer as saying.

The cloud of gas swept across a **25 square kilometre** area on Tuesday, **devastating villages and poisoning farms.** More bodies were found in mountain villages on Sunday, pushing the death toll up by 35. About 1,000 workers were clearing away almost 4,000 animals, including cattle, pigs, rabbits, ducks, chickens and dogs, killed by the gas well burst, Xinhua said.

The Ministry of Civil Affairs has sent 10,000 quilts and 300 tonnes of food and medicine to the victims. Workers poured hundreds of cubic metres of mud and cement into the 400-metre-deep well in Kaixian county on Saturday, plugging a mix of natural gas and sulphurated hydrogen that caused acid burns to the eyes, skin and lungs of victims.

A total of 10,175 people were either hospitalised or treated and discharged. Nearly 80 people were in serious condition.

State-run China National Petroleum Corp, which operates the gas field and parent of listed oil major Petrochina, will pay compensation to villagers, state television quoted company vice president Su Shulin as saying.

Xinhua did not say how the latest deaths occurred, but many of those injured reported suffered gas poisoning and skins burns from exposure to the fumes.

Jan 5 2004

The death toll from a gas-drilling accident that spewed toxic fumes over villages in south western China rose to 243 today, after 10 injured people died in hospital.

An additional 396 people were still being treated following the December 23 disaster north east of the city of Chongqing, the official Xinhua News Agency said. It said 27 of those were in a critical condition.

The government has blamed negligence among gas-drilling workers for the accident in which a well blew out and spewed a toxic mix of natural gas and hydrogen sulphide over the mountainous area.The well was sealed on December 27.

More than **9,000** people were treated for injuries and more than **60,000 evacuated** from the area.

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SHELL GAS EXPLOSION

LANDS HUNDREDS OF COMMUNITY PEOPLE IN HOSPITALS/CLINICS: IWHREKAN, UGHELLI SOUTH LOCAL GOVERNMENT COUNCIL, DELTA STATE

April 26, 2001

HIGHLIGHTS

- Shell's Gas explosion threatens the peace of Iwhrekan community.- Local population lives in constant fear.- Shell engages in hide and seek game over explosion.- Gaseous fume may engender refugee crisis in Iwhrekan Community.

ABOUT IWHREKAN COMMUNITY AND PEOPLE

Iwhrekan is an Urhobo Community in the Ughelli South Local Government Area of Delta State. The Community houses UTOROGU GAS PLANT; it also has 29 oil wells and, produces 270,000 barrels of crude oil per day. Shell Petroleum Development Company (SPDC) is the sole operator of oil and gas facilities in the community.

"500 IN HOSPITAL OVER GAS LEAKAGE"

The above was the lead story of a local newspaper report over the Utorogu gas explosion (South - South, Thursday, April 26, 2001, page 1, volume 1. No. 239).

On April 19, 2001 at about 4.30 a.m., the community woke up that fateful morning and was threatened with a very loud noise which emanated from the Utorogu gas plant and subsequently, followed by gas rain. The incident lasted for about 2 weeks. The gas rain resulted into serious health impairment, which engendered an outbreak of epidemic in the area. Community activists told ERA that, over 500 persons are scattered in various hospitals/clinics outside the community receiving medical attention. The hospitals/clinics are the General Hospital and Shell Heath Center, all in Otujeremi in Ughelli South Local Government Area in Delta State. The following were reached on their sick beds during field trips:

Mr. Friday Ogbah Mr. Johnson Otaye Mrs. Esther Luwadure Mrs. Siaka Oghogho Mrs. Titi Onokere Miss Mercy Luwadare (2 yrs.) Old)

Top medical sources who pleaded anonymity and claimed to have treated some victims in an interview with ERA said the victims suffer from ailments such as sensation of the skull, vomiting, diarrhoea and peppery feelings in the eyes associated with contact with dangerous substance. Nearby farmlands and streams were whitened by the pollution.

"WE ARE NOT AWARE OF ANY GAS EXPLOSION; GOOD DAY AND BYE"

When ERA visited the gas plant for Shell's comment on the incident an official who spoke to ERA on phone banged the phone on us screaming, "we are not aware of any gas explosion; good day and bye."

Mr. Johnson Otaye, the General Secretary of the Iwhrekan Community told ERA from his sick bed that, after the explosion occurred Shell held a closed door meeting with journalists in Warri City, Delta State over the explosion to ensure the under-reporting of the incident. Some of the community people who spoke, expressed their willingness to be relocated from the community if the opportunity is given the real option, because, the gas plant is located right inside the community and the threat it poses is enormous.

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SHELL PIPELINE EXPLOSION

A huge clean up operation is underway in the Nigerian Delta State following a pipeline explosion. It is understood a Shell pipeline exploded near the town of Ughelli spilling oil onto nearby farmland. Nobody was injured in the incident but reports claim up to 1 m barrels of oil were spilled in to the countryside. This has been vigorously denied by Shell. It says the trunk line was immediately shut down after the alarm was raised. A Shell spokesman said a Joint Reaction team of trained experts was at the scene but the cause of the blast and an entire picture of the damage done is not yet known.
Reports said there were 10 storage tanks each capable of holding 50 barrels of oil and two Shell security officials guarding the burst pipe which, was still pouring oil into a deep hole made by the initial explosion. This is the latest in a long series of pipeline explosions that have claimed the lives of hundreds of people in the last few years.

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Shell's Leaking Pipes

ERA FIELD REPORT #53
Subject: Shell's Leaking Pipes
From: Patrick Naagbanton
Dispatchline: Gana, Ughelli-North L.G.A., Delta State
Date: **January 12, 2000**

HIGHLIGHTS
Gas fire outbreak in sight
Death toll rises, Children and women victims

> *When I die, know that Shell killed me....*
> Master Jerome Atariku, 7 years
>
> *I find it difficult to move and to breathe. Others have relocated leaving only me. I have no place to go. Tell them [shell] to come and stop this gas so that the cough and itching will stop..*
> Mrs. Omodovwe Adjohowo, 97 years.
>
> *Anytime I come to this spot [leaking pipeline] I have problems with my respiratory system and this is the only route to my work place.*
> Mr. Osikekpe Samson, 36 years
>
> *We have heard and read that shell.s staff are being held hostage by our people because of this explosion. You [ERA Monitor] have spent sometime here in our community and you have seen things for yourself. I appeal that you go to the world and say the truth, if you do that God will be with you. But .[striking his chest and weeping uncontrollably], Shell has sinned against God and our people, they have told lies against us. Are we violent as they say?*
>
> Gospel Emueheri, 30 years

BACKGROUND
Gana is an old rural settlement of Urhobo ethnic nationality in Ughelli-North Local Government Area of Delta State. The people are predominantly farmers because of the available fertile land in the area. The population of Gana is about 4,982 persons. Shell.s famous Eriemu oil field, 20 oil wells, network of facilities/ installations criss-cross the entire Gana community. Shell started operation in the place since 1958.

Gana community hosts the Gas project belonging to Nigerian National Petroleum Corporation (NNPC). All the above facilities are located inside the community.

GANA COMMUNITY, POLLUTED AND UNSAFE
On May 26, 1999, a major blowout occurred at Shell.s 16 inches truck line at Ikavwe bush and large quantity of crude oil spewed out. The affected area has vulnerable receptors like canals, swamps and open water bodies which aid the degrading effects of the spill. The following communities were heavily impacted.

1. Opherin community - Ughelli North LGA (Delta State) 2. Owevwe community . Ughelli North LGA (Delta State) 3. Onah community . Ughelli North LGA (Delta State) 4. Iyede community . Isoko North LGA (Delta State) 5. Emevor community . Isoko North LGA (Delta State)

The spill was not cleaned nor were compensation paid. Till the time of this report, the impact is still greatly felt in the affected areas.

On September 11, 1999, another major spill occurred at the Eriemu manifold situated in the community. The spill forced its way through a fragile valve (technical failure of Shell's equipment). The spill was not attributed to sabotage but the spill was abandoned.

DEATH TOLL RISES, GAS FIRE OUTBREAK IMMINENT

May 13, 1999

Mr. Shedrach Oniyere, a 40 years old father of six children and Chairman of Gana community lamented to ERA that on May 13, 1999, a rupture occurred at the well 17 pipeline and spewed crude oil into the adjacent environment. The community said Shell only visited the community and did minor repairs on their aged pipeline leaving the environment devastated without any attention.

Consequently, another leakage occurred recently and spewed poisonous gas at the same well 17 pipeline that runs through Mrs. Omodovwe Adjohwo.s compound. ERA finding revealed that the leakage was caused by corrosion on the product pipeline.

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The air in the community is charged with offensive odour and dangerous emissions from the affected site. This adverse atmospheric condition in the area has given rise to fears of impending epidemic in the area.

Unfortunately, the area has no health care facilities. The sanitary condition is very poor because of the polluted environment. The people are impoverished and suffer from poor nutrition. These factor are all conducive to disease vectors like cholera, dysentery, diarrhea and measles which has led to a high mortality rate in the community.

Late Mr. Joseph Evwietoma (a 48 years old man with two wives and 11 children) who was an asthmatic patient and the spokesman of the community slumped and died while inspecting the spill site with some government officials and some community members.

Medical sources who pleaded anonymity disclosed to ERA monitor at the Shell cottage hospital at Ireke in Ethiope East LGA, of Delta State, that the man died as a result of inhaling an excess of poisonous fumes. Another victim Master Godstime Obior, a 6 years old boy who was also asthmatic died in his residence close to the site of the explosion for the same reason. The corpses of the two deceased persons are still in the mortuary.

The following Gana community members are in critical conditions from the same problem situation. They are in Ughelli and Agbara main town:

1. Master Odiri Shedrach - 1 year
2. Miss Anthonia Etaka - 5 years old
3. Miss Gift Power - 1 year
4. Miss Vwareua - 8 years
5. Master Freeborn Oteri - 8 years
6. Master Matthew Mukoro - 6 years
7. Mr. Paul Etarhienyo - 27 years old

APPEAL FOR RELOCATION

Gana community hosts SPDC and NNPC facilities. There are good access roads to the manifold, oil field, flare points, plants etc but Gana lacks all these amenities. There is constant electricity supply at Eriemu oil field, but Gana community remains in darkness. As many of the community people desert the affected area, a grave refugee problem is in sight.

There is also the fear of a possible gas explosion. Community people in an interview with ERA indicated their interest to resettle elsewhere if government provides an alternative place.

ERA RECOMMENDATIONS

- Shell should stop their gas leakage and dispatch a team of medical experts to the community to save lives
- Shell should pay compensation to the Gana people
- Government should re-settle the Gana people or relocate their old and ageing facilities

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Explosion at Moomba gas plant Jan 2004

About 50 South Australian businesses were asked to shut down in the wake of an explosion and fire at the Moomba natural gas plant.

The explosion caused a fire at the Santos plant in SA's far north-east which took emergency crews about seven hours to control.

Investigators were trying to determine the cause of the fire, which started about 3am CDT. There were no injuries.

The liquid recovery section of the plant was shut down, prompting the state government to ensure domestic gas supplies by asking major users to shut down.

A Santos spokesman said engineers had flown to the gas field to assess the damage.

LONGFORD GAS EXPLOSION SEPTEMBER 1998

By Vannessa Hearman

MELBOURNE -- At the end of April, final submissions were presented to the royal commission into the gas explosion and fire at Esso's Longford facility in the Latrobe Valley. The Victorian Trades Hall Council has called on the state government to toughen its stance on occupational health and safety in the light of the evidence presented to the commission.

On community radio 3CR's *Stick Together Show* broadcast on April 30, VTHC secretary Leigh Hubbard told Meredith Butler that Esso is guilty of a "gross negligence" in its operations, and in its health and safety and management culture: "For example, [Esso management] did not implement the emergency response agreement with the Country Fire Authority."

Hubbard also strongly criticised the state government's failure to implement a safety regime for major hazard facilities like the Esso gas plant. "Some of the problems should have been picked up. The valve that went seriously wrong -- everyone knew it was malfunctioning -- was not taken out of the system and overhauled. Instead, Esso said it would just look at it again in 2005."

Hubbard pointed out that if inspectors had visited the site regularly, instead of plant managers being relied on, the fact that staff were not being trained to deal with catastrophic events would have been quickly apparent.

Andrew Hopkins, who also conducted an in-depth study of the 1986 Moura mine disaster in Queensland, also gave evidence to the commission. Hubbard said Hopkins' evidence was important because "he talked about management culture ... at Esso Longford you see boards up stating how many days it has been since a `lost time injury' ... It is all focused on things that workers do, for example if they slip over, not on production-based major catastrophic events" which are the responsibility of management.

There were many similarities between the safety regimes at Moura and Longford, Hubbard noted. "It was eerie reading [Hopkins'] book on the Moura mine disaster because you could almost substitute the words `Esso Longford' for `BHP Moura'. The same string of system failures which happened there happened at Longford."

On the Victorian WorkCover Authority's plan to introduce in the next two years a new system to regulate major hazardous industries, Hubbard said that while VTHC is pleased that the government is finally implementing the national standard, "we have to wait to see the results because often the devil is in the detail. There are things we won't compromise on.

"First, an operator of a major hazard facility must lodge a safety case with the [government] regulator outlining how it will cope if something goes wrong. Second, the safety case must be approved by the regulator, not simply received."

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Coroner blames Esso for Longford Gas Explosion September 1998

November 15 2002
By Liz Gooch

The State Coroner today blamed oil giant Esso for the 1998 Longford gas disaster which killed two workers and cut the state's gas supply for about two weeks.

Mr Wilson, a maintenance superintendent and Mr Lowery, a maintenance supervisor, died on September 25, 1998 when a gas explosion shook the Longford plant as equipment couldn't handle the unusually high gas flow.

For two weeks after the blast, Victorian businesses and households struggled to operate without gas in a crisis which was estimated to cost gas users about $1.3 billion.

Businesses were shut, workers were stood down without pay and emergency legislation was introduced to preserve the remaining gas.

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In June 1999, a Royal Commission found that Esso's failure to adequately train workers in safety procedures caused the disaster and recommended that the company upgrade its training, safety monitoring and emergency procedures.

In July last year, Esso was fined a record $2 million in the Supreme Court after being found guilty of 11 charges under the Occupational Health and Safety Act.

After the verdict, 10,000 consumers and businesses who suffered financial loss during the gas shortage sued Esso in the Federal Court.

Eighteen Esso workers and their families also mounted a class action against the company in the Supreme Court. In a separate case, the Insurance Council of Australia sued Esso on behalf of 120 large businesses that lost production or had shut down during the gas crisis.

The World Today Archive - Thursday, 28 June , 2001 00:00:00

Reporter: Luisa Saccotelli

ELEANOR HALL: Well to a new development in the court case against the giant petroleum company, Esso.

The case was brought after the deadly explosion at Esso's Longford Plant in eastern Victoria nearly three years ago which killed two people.

Late this morning a jury in the Supreme Court in Melbourne found Esso guilty on 11 charges, as Luisa Saccotelli reports.

LUISA SACCOTELLI: The explosion at Esso's Longford Plant back in September 1998 cut gas supplies to more than a million homes and businesses for two weeks.

Two long-standing maintenance employees, Peter Wilson, and John Lowery were killed and eight others seriously injured. Piled on to that were business losses upwards of $1 billion.

Eyewitnesses painted a horrific picture of blazing fireballs and men walking around dazed and blackened after the blast.

A seven months royal commission savaged Esso for failing for properly train and supervise its workforce and for failing in its fundamental duty of care to provide a safe workplace.

The sequel to the royal commission has just been played out. A Supreme Court trail of Esso, prosecuted by the Victorian Workcover Authority for 11 safety breaches.

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Gas Explosion Rocks Umtata

Posted Fri, 19 Sep 2003

A welding gas cylinder which exploded in Umtata on Thursday injured a child, demolished a house and four cars and also damaged at least 97 houses in a two-kilometre radius.

A Ngqeleni messenger of the court, Ndumiso Maqokolo, said that during the afternoon he was doing a welding job on one of the vehicles next to the main gate of his house.

A few hours later he left the area and walked towards his house when he heard a loud blast when only a 19kg cylinder exploded.

Illinois Gas Plant Explosion Forces Area Evacuation

November 14, 1998
Web posted at: 3:32 p.m. EST (2032 GMT)

FISHER, Illinois (CNN) -- Officials say a fire at a natural gas plant in east-central Illinois is out after an explosion Saturday morning that required a nearby neighborhood to be evacuated.

Flames shot 400 feet in the air when a gas main exploded, said Steve Zehr of the Sangamon Valley Fire Protection District.

Fire officials say they had the blaze under control quickly.

But people who live within a one-mile radius of the People's Gas plant still have not been allowed to return to their homes. Zehr estimated about six homes were evacuated.

No injuries were reported. The explosion occurred in a gas storage well, Zehr said.

The plant is located near the town of Fisher, about 100 miles south of Chicago.

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An Roinn Cumarsáide,
Mara agus Acmhainní Nádúrtha
Baile Átha Cliath 2.

Department of Communications,
Marine and Natural Resources
Dublin 2.

22 January, 2004.

Mr. Iain Douglas,
Senior Planner,
Mayo Co. Council,
Aras an Chontae,
Castlebar,
Co. Mayo.



Re: - PO3/3343 Shell E&P Gas Terminal at Bellanboy

Dear Mr. Douglas,

I refer to your letter of 15 January, 2004 and previous correspondence addressed to me at this Department, concerning the above application.

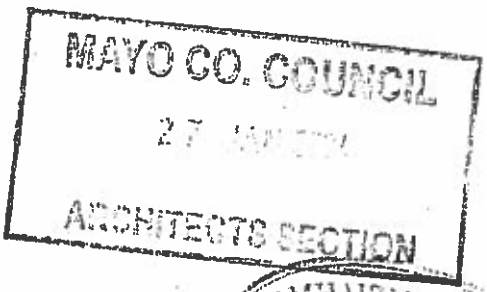
Please note that I have passed all your correspondence received to date on this matter to Mr. Michael Daly, Principal, Petroleum Affairs Division, Beggars Bush, Dublin 4, as he is the person dealing with same. Any further material on this application could be sent direct to Mr. Daly.

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Yours sincerely,

Breda Holly

Breda Holly,
Gas(Corporate) & Peat Division.







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THE CORRIB GAS PROJECT

THERE is also more confusion on Mayo County Council's handling of the Shell Corrib Gas project. The following is the timetable of the availability of the CD version of the EIS to me, as a member of the public:

Dec 17th: Planning application and EIS submitted by Shell to Mayo County Council.

Dec 19th: CD copy of EIS requested from Mayo Co Co – not available.

Dec 22nd: Still not available, despite assurances on Dec 19th.

Dec 23rd: Contacted by Mayo Co Co to say EIS CD available. Offered one CD and informed that all information was contained thereon. Asked the official to check – on his return he said there was another CD, which was handed over. The fee of €20 was paid to Mayo Co Co. About ten minutes later I received a call from Mayo Co Co - there were another two CDs that also form part of the EIS. Returned to collect same.

Dec 30th: Informed by Mayo Co Co that they had been advised by Shell that the CDs did not contain all the relevant information. Another CD issued.

Jan 16th: Received a registered letter from Mayo Co Co with another CD and the details as follows.

"The applicant has brought to our attention that a number of files were inadvertently omitted from the digital version of the EIS given to Mayo County Council on CD and copied to you. The missing files, contained in the enclosed CD and labelled to match the folders contained in your earlier CDs are as follows:

There is a Chapter 5 contained on the CD however it is an old draft of this chapter. This new file which contains the most recent census data is the version of chapter 5 contained in the hard-copy of the EIS.

Additional Note: Waste licence application drawing WLA_300 series.pdf and WLA_series.pdf were sent to you on disk in error – these do not form part of the planning application or EIS. To ensure that any submission you may wish to make in relation to the missing files can be considered, you should make a submission based on the information contained in the original discs before 30th January 2004 in the normal way. Submissions on the missing files up and including (sic) 19th February 2004 will be considered by Mayo County Council as supplementary to your first submission. This is to ensure that the Council can give consideration to your full submission...

Confused? In short, the time for submissions on (some of) the EIS has been extended. Some people have been waiting since December 19th for CD copies of the EIS. Can any Mayo County Council official explain why? Can this disrespect for the rights of the public be classed 'Government Policy'?

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Pro Erris Gas Group

Correspondence To:- 33 Sion Hill, Castlebar, Co Mayo

Ph:- 087 6177559





Planning Department,
Mayo County Council,
CastleBar
Co Mayo

Ref:- P03 / 3343

Dear Sir/ Madam

Attached is a copy of a submission we wish to have included in the Planning Application Submitted by Shell for the proposed gas terminal in Bellenaboy, Co Mayo.

Please also find attached a Cheque of €20 in order to validate our submission.

For inspection purposes only.
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R no 6380
€20
26/1/04

Kind Regards

John Rowland

John Rowland
For and on Behalf of PEGG

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Pro Erris Gas Group

Correspondence To:- 33 Sion Hill, Castlebar, Co Mayo Ph:- 087 6177559

To	:-	The Planning Department Mayo County Council
Reference	:-	Planning application submitted by Shell for the Corrib gas terminal
Reference No	:-	**P03 / 3343**
Submission Date	:-	23 January 2004
From	:-	Pro Erris Gas Group (PEGG)

To Whom it Concerns,

The Pro Erris Gas Group was formed as a result of a large public meeting held in Bangor Erris on the 8th July 2002. Our committee of 7 people were selected to represent the local community who have an interest in gas being brought ashore within the Erris region.

Our aims are improved infrastructure for the area and in turn creation of jobs.

We consider this project as one of the largest and the most significant developments since the inception of Bord na Mona and the ESB, and also as the most significant development within the Irish Energy sector over the last twenty years.

It is our duty to ensure that we use this development as a significant engine for growth in our area as it will play an integral part in the future development of the West and North West regions.

We have followed this planning application meticulously over the last 2 years and do acknowledge the shortcomings of shell's initial planning proposal as rejected by An Bord Pleanala. However, we are very satisfied that this new application devised in conjunction with Bord Na Mona will fully address all shortcomings of the initial Plan.

We therefore urge you to consider the Application from shell in the most positive light permissible within the planning guidelines laid down by the Authority.

Kind Regards

John Rowland
For and on Behalf of PEGG

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BANGOR ANGLING CLUB



Tel.: (097) 83039.

BANGOR ERRIS,
BALLINA,
CO. MAYO.

23/1/04

To Chief Planning Officer
Mayo County Council

Re Proposed Gas Terminal @ Ballinaboy and ancillary Works @ Shanore Bangor Erris Our club favour the applications for Planning subject to our concerns as outlined overleaf been covered in the E.I.S. relative to the Project.

03/3343.

Yours faithfully

Des O'Rourke. Sec.

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E20 26/1/04.
Rno 6382

SCANNED

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Queries

(1) (1) Size of Depository @ Shramore 1 Sq Mile Kl = 1 Million Sq Mts. - At aspread of 1 mt Deep is this area necessary. or is the figure of 450.K Sq Mts incorrect - Plan would indicate a much larger Deposit.

(2) Natural Drainage from Site would indicate drainage will be into Bolt Munhin and Dunmore Rivers :-

In the event of exceptional sudden down pours such as this area experience in '97 and this year what are the plans to prevent Pollution of the Rivers

(3) What are the contain ment plans for Run-off in this situation.

(4) In the event of the Salmonoid life in those Rivers been destroyed will there be a re-stocking Programme in Place.

03/3343

(5) It appears that the Route from Ballmaboy to Shramore crosses 5/6 Rivers/Streams which are the Habitat of Juvenile Salmonoid - Evaluate the protection measures you will undertake in this area

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IRISH
OFFSHORE OPERATORS' ASSOCIATION

c/o Tramway House
Dartry Road
Rathgar
Dublin 6

Tel: +353 (1) 497 5716
Fax: +353 (1) 497 5886
Email: IOOA@tramway.ie

22nd January 2004

Planning Section,
Ground Floor,
Mayo County Council,
Aras an Chontae,
The Mall,
Castlebar, Co Mayo

26/1/04
€20
Rec 6397

SCANNED

Planning File Ref: P03/3343

A Chara,

The Irish Offshore Operators' Association (IOOA) is the representative body for companies engaged in exploration and production of oil and gas offshore Ireland.

IOOA wishes to support the application for a gas terminal at Bellanaboy Bridge, Co. Mayo, submitted by Shell E&P Ireland, Ltd.

Gas, for reasons of both efficiency and the environment, is currently the fuel of choice for power generation, space heating and process industry,. However, Ireland currently imports over 80% of its gas, a level of dependency that is undesirably high.

Indigenously produced gas, on the other hand, offers a number of unique benefits.

European gas will increasingly be sourced from far afield, such as northern Norway, the former Soviet Union, Central Asia and North Africa, with obvious implications for security of supply. Indigenous gas offers greatly enhanced security

Indigenous gas also provides a cap on imported gas prices, since Irish producers must discount the import price to be sure of selling their gas.

Finally, producing gas requires both investment and work. If we import gas, investment and jobs migrate abroad. Indigenous gas keeps these benefits at home, These benefits are also regional, and when we see the investment that has sprung up along the Cork-Dublin pipeline, we can suggest with confidence that similar benefits will accrue to the Northwest, with the arrival of Corrib gas.

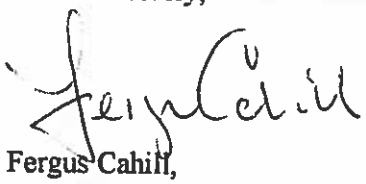
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There is the additional consideration that successful completion of the Corrib project will undoubtedly reawaken interest in exploration off the West coast, with the hope of further discoveries and all that that would bring by way of investment, employment and development.

The Corrib project, in our view, is in the both the national and local interests, and for all of the above reasons, IOOA strongly supports this application,

Yours sincerely,



Fergus Cahill,
Chairman

Encl: Cheque €20.00

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Gerard Mc Donnell
Aughoose, Pullathomas, Ballina, Co. Mayo
and
Dooncarton, Glengad, Pullathomas, Ballina. Co. Mayo
Tel.: (087) 246 59 12
E-mail: gmd@chello.at

SCANNED

Mayo Co. Council
Planning Department
Aras an Chontae
Castlebar
Co. Mayo

€20
RNO 6396
26/1/04

20 January 2003

By Registered Mail

Re.: Planning Application P03/3343 – Submissions and Observations

A Chara

I would like to make this submission and a number of observations to you with regard to Application P03/3343 by Shell E & P Ireland Ltd, for the development of a gas terminal for the reception and separation of gas including plant and equipment at Bellagely South, Ballinaboy Bridge and for a peat deposition site at Shrahmore and Attavally, Bangor Erris. I enclose the prescribed fee of EUR 20 as required by Mayo Co. Council.

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For inspection purposes only.

This proposed development is certainly the biggest ever Erris has seen and probably the biggest in Co. Mayo and the West of Ireland. I am in full support for bringing gas into Ireland – it is a right of a country to tap into its natural resources, be they on its lands or in its waters. This gas field will certainly contribute to the economy of Ireland in general, particularly where the gas will be consumed, such as Galway, Dublin and the South of Ireland. It will help replace the Kinsale field over time.

The manner in which this application in general has been handled has been totally unsatisfactory. The expectations of Shell E & P Ireland Ltd and the Irish Government are totally outrageous compared to what the locality of Erris and Co. Mayo is being provided with.

The application provides next to no information as to what or how the Barony of Erris and towns beyond would benefit from the construction of the gas terminal and peat deposition site. I am calling Mayo Co. Council to take this into account when they are considering this application. Please note that this should be irrespective of the fact that a previous application was once upheld by Mayo Co. Council. There has been much water under the bridge since then. Planning regulations have become stricter, environmental laws are being better enforced and there has been at least one natural catastrophe with the landslides of Dooncarton, Glengad last September. This application should therefore be seen in an even stricter light.

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Let me make one point with regard to the Peat Deposition Site proposal. The removal of the peat, while sounding like a novel idea, still does not justify the proposal that the site is 'ideal' for the terminal. A bog is always a bog and such a terminal does not suit the terrain that exists. I will however leave the scientific details to the experts and many neighbours and residents of Erris who have been raising strong objections to the terminal on the basis of its potential risk to the environment and safety.

Below please find my submissions and observations which are focused on elements such as the benefits to Erris in general and the pay-off to local residents and the community for the erection of a structure such as that in this application. Based on my submissions and observations below I believe that, should they not be fulfilled or adhered to, the terminal should be rejected.

1. Observation

The planning application submitted only gives a vague indication of how Shell E & P Ireland Ltd. would contribute to the local economy. There are no specific proposals given by Shell E & P Ireland Ltd. as to how the economy will grow (except for the detail that the workforce will be up to 50 people once completed. I assume that many of these would be highly skilled workers such as scientists who may not be available in Erris). The company should give clearer details on how it expects the local economy to perform with such a development in Erris. The company does not clarify fully how 'the development is likely to act as a catalyst to economic development'. This is not good enough in the context of such a huge development, particularly when it seems to be that the returns to Shell from this gas field will be very good. These issues should be clarified further by Mayo Co. Council.

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2. Observation

My main criticism of the terminal proposal is that Erris as a barony is not being offered a good enough return on its 'investment' of its valuable resources (land, strand/beaches and sea and air and especially farmland) from Shell or the Irish Government. I propose to you that gas be provided to Belmullet, Bangor, Ballina, Crossmolina, Castlebar and Westport. Shell may counter argue and be correct in saying that this issue is not in its hands as this is an issue for Bórd Gas. However this is not the way to go. Shell should be asked to actively work with Bórd Gas to ensure that such services are provided to local towns.

3. Observation

The applicant has undertaken to set up the Corrib Community Fund. This, in my opinion, is not specific enough. Mayo Co. Council, if it decides to grant permission for the development, should set strict specific conditions to Shell on what it should do for the local community. This could be in the form of a fixed amount of funds per year for the duration of the terminal's life, e.g. up to EUR 500,000 per annum to be invested in the Erris region on socially

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beneficial projects (sports, culture, projects for children and the elderly and families, local schools, community centres, etc.)

I would also propose the following concrete, more specific suggestions:

- A community centre for Aughoose village
- New or updated computer facilities for all national schools in Erris
- A facility at the terminal to provide bottled gas to the local community around the terminal (i.e. Erris)
- Two thirds of construction jobs to go to Erris inhabitants
- Support for a football field and facilities for Pullathomas
- Upgrading the sports field in Inver including building changing rooms
- At least one third of jobs in the terminal to go to Erris inhabitants
- Sports facilities for Glenamoy GAA football pitch
- Better sports facilities for Bangor town
- Set up a trust fund to finance 5 local young people to study university degrees and 5 local young people for apprenticeships
- Provide apprenticeships to three local young people at the terminal every year in a suitable discipline
- Help provide local sports courses in the areas (karate training courses in community centres, aerobics, tennis, squash, etc.)
- Contribution to Belmullet Community Hospital for the provision of a day care centre for local elderly citizens and Alzheimer patients
- Generous contribution to the Western Alzheimer's Association for a Respite Care Home with 15 beds for Erris for Alzheimer patients for the North Mayo Area
- A contribution to the Tidy Town's Committee in Belmullet town in the form of lights, benches, trees, maps, etc.
- The setting up of a low interest loan facility through the local Belmullet credit union for people of the area to help them invest in their properties
- A contribution to the region around where the recent landslides took place – Dooncarton, Glengad, Cornhill, Seanbhaile, Pullathomas (a fund to help repair the local graves, a tree planting scheme for the hills where the landslides occurred, etc.)
- The setting up of a number of waste collection points throughout Erris for paper, glass, tin and organic waste and be responsible for its collection. This would be a good contribution to the environment
- Provision of training courses in personal development to local residents in Erris (motivation, leadership, conflict management, etc.)
- Financial grant to Pullathomas Women's Group for its programmes

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4. Observation

Re. Architects Report for Planning Permission

There are not enough views of the terminal buildings presented in the report. What seems to be missing is the views of the tall buildings (stacks). A clearer view in this report would be required of what the total proposed development

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will look like. I would also like to see what the compressor buildings, storage tanks and methanol storage tanks would look like.

5. Observation

I do note that Mayo Co. Council has already in the past given this facility the green light by granting planning permission to the Ballinaboy Bridge proposal. I do urge the planning officials to put aside what was already decided and put aside what issues were accepted by the Board of An Bórd Pleanala and treat this application as a totally new application. This is the policy that applicants of houses are told of when re-applying for planning permission, changing plans or seeking retention (I was certainly told this when I re-applied for permission on my house and I was warned that certain elements such as a conservatory or dormer windows could be 'conditioned out' in any new application!). I urge Mayo Co. Council to look at each element of this application on its merits and not sacrifice one element for the benefit of the project as a whole. It should not be the sum of the whole context but the merits of each individual part of this application: suitability of the location from an environmental, safety, economic and social point of view.

6. Observation and Conclusions

Shell in this application has not shown how it would be a partner to the local environment, the community in general and the residents of Erris. This application by Shell does not show enough how it will enhance the area. All developments whether they are houses or factories or community centres or gas reception terminals should not just from an optical point of view but also from an environmental and economic point of view enhance the environment around them. 'Not enhancing the local environment' is often a good reason why developments are turned down by the planning departments of local authorities. The contribution Shell makes to the local community in terms of social progress, economic activity and the general well-being of the local population must be high. As it currently stands the deal that Erris as a region is getting in return for allowing such a facility is very poor. I would argue that this is also the case for Co. Mayo as a whole. I appeal to Mayo Co. Council to put Erris' and Mayo's welfare at the top of the agenda in this application.

I am available to discuss these issues at any time. Please do not hesitate to contact me if you have any questions.

Is mise, le meas

Gerard Mc Donnell

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Bangor District Development Association

Bangor Erris
Co.Mayo.
Tel: 097-83039

RECEIVED
Comhairle Contae Mhaigh Eo

To Chief Planning Officer
Mayo Co Council.

03/3343

Dear Sir,

Bangor District Development Association beg to Inform you that we are in favour of the Grant of Planning to the Proposed Gas Terminal at Ballinaboy and Peat Depositary at Shramore. Bangor Erris The Project will Bring much needed prosperity to the Erris Region.

Yours faithfully.

Des E Rourke, Sec.

E20
RNO 6381
26/1/04

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KENNEDY MOTORS

BINGHAMSTOWN
BELMULLET
CO.MAYO

Phone (097)82082/82428



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23/01/2004

REF: Shell E & P Ireland

Planning Ref: 03/3343

26/1/04
€20
Rno 6383

Dear Sir/Madam

As a local business person in the Erris area who has 12 employees, I would like to express my support for the project. I feel it will be of great benefit to the businesses and the area in general. They have to my knowledge made every effort to co-operate with people and made themselves available to answer the concerns of the locals. As a business person and native of Erris I would like the expression of my support to be noticed.

Enclosed submission fee of €20

Yours Sincerely
K. Kennedy
Kevin Kennedy

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Ref NO.

P03/3343.

097(87965)

SCANNED

The Bridge
Glenamoy
Ballina
Co Mayo

23-1-04

Dear Sir or Madam,

I Mrs Katie Healy Wish To withdraw my objection's I Submitted to your Office on the 16/1/04. Concerning the building of a SNS Refining Terminal at Bellinaboy Co. Mayo on all grounds, my Withdrawl is due to mis-leading Information I Received Please Remove my objections letter from your files as Soon as Possible

Thanking You

Yours Sincerely

Mrs Katie Healy

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097 - 079 92.

Ref No
P. 03/3343.

SCANNED

Bunowna,
Glenamoy.
Ballina
Co. Mayo
26/1/04

Dear Sir or madam,

I Nancy Healy wish to withdraw my objections to a Submission I lodged to your office on the 16/1/04 concerning the construction of a proposed gas terminal at Belliniabo Ballina Co. Mayo. on all grounds. Please remove my objections from your files as soone as possible. The reason I am withdrawing my objections is due to misinformation I received. Sorry for any inconvenience caused.

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Thanking you.

Mrs Nancy Healy

MAYO COUNTY COUNCIL
RECEIVED
23 FEB 2004
PLANNING & DEVELOPMENT

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IRISH AVIATION AUTHORITY
ÚDARÁS EITLÍOCHTA NA hÉIREANN

AVIATION HOUSE, HAWKINS STREET, DUBLIN 2, IRELAND
TEL: (01) 671 9655 FAX: (01) 679 2934
WEB SITE: www.iaa.ie

22nd January, 2004

The County Secretary
Mayo County Council
Planning Section
Aras an Chontae
Castlebar
Co. Mayo

Re: Planning permission sought for the construction of a gas terminal for the reception and separation of gas from the Corrib Gas Field etc. ain the townland of Bellagelly south and the site of the peat deposition site in the townland of Srahmore and Attavally, Bangor Erris, Co. Mayo, Applicant: Shell E & P Ireland Limited (Planning Ref. No. P03/3343)

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Dear Sir

I refer to the above proposed mast, details of which were forwarded to the Irish Aviation Authority. I wish to advise you that the Authority's comments are the same as those conveyed to you on 28 June 2001, which are as follows:

The site for the proposed installation is approximately 7km from the Authority's radar facility at Dooncarton, Co. Mayo. From the information supplied, it appears that the development will not cause major reflections on the Dooncarton radar data. However, the Authority requests that it should be made a condition of any planning permission granted in this case, that the applicant should be required to contact the IAA before construction commences, and provide any information that may be required to satisfy the Authority that the development will not interfere with the radar, communications and navigation systems at Dooncarton.

Yours sincerely

Tom Cooney
Strategy Unit

SCANNED

REGISTERED OFFICE: AVIATION HOUSE HAWKINS STREET DUBLIN 2 IRELAND
REGISTERED No. 2 1092
BOARD OF DIRECTORS:
DONAL J. GEANEY (CHAIRMAN) SEAMUS BRENNAN (CHIEF EXECUTIVE)
NEIL BRANAGAN PHILIP CAFFREY, FRANK CONWAY, KATHLEEN DALY,
DONAL F. DOWNING, ANNE LAIL, SHEILA McCABE

EPA Export 08-07-2014:23:49:48

03/3343

ROSSPORT
BALLINA
CO MAYO
14/1/04 .

CHIEF PLANNING OFFICER,
MAYO COUNTY COUNCIL,
CASTLEBAR,
CO MAYO.

REF. GAS AND OIL TERMINAL AS
PROPOSED BY SHELL/ENTERPRISE OIL
AND ASSOCIATES LOCATED AT GLENAMOY
BALLINA, CO MAYO.

Rn 6286
€20 PO.
20/1/04

A CHARA,

FIRST OF ALL I FIND IT IS UNFORTUNATE THAT A 20 EURO FEE IS LEVIED ON PEOPLE WHO IN THE INTEREST OF PROTECTING THEIR HEALTH AND LIVELIHOODS ARE TAKING THE OPPORTUNITY TO COMMENT ON THIS PREPOSTEROUS PROPOSAL.
MANY GOOD CITIZENS HAVE ALREADY SUFFERED SIGNIFICANT PAIN, COST AND INCONVENIENCE IN THEIR EFFORTS TO AIR THEIR VIEWS ON PREVIOUS APPLICATIONS REGARDING THIS ABHORRENT DEVELOPMENT.
I HAVE NOT HAD THE OPPORTUNITY TO STUDY THE CONTENTS OF THE MOST RECENT ENVIROMENTAL IMPACT STATEMENTS, BUT ONE CAN ONLY HOPE THEY CONTAIN MORE TRUTH AND ACCURACY THAN THE ORIGINAL ENTERPRISE OIL E.I.S. WHICH CAN HONESTLY BE DESCRIBED AS CONTAINING SIGNIFICANT AMOUNTS OF FICTION FAVOURABLE TO THE COMPANIES INVOLVED.
I RECALL FOR EXAMPLE THE OVERNIGHT DISAPPEARANCE FROM BELLINABOY OF AROUND ONE DOZEN HOUSES FROM WITHIN THE 1.5 KILOMRTERES ZONE OF THE TERMINAL SITE AND THE APPARENT SIMULTANEOUS TRANSFORMATION OF THE HISTORIC SOD FENCING ALONG THE PIPELINE ROUTE THROUGH THE FARMS OF ROSSPORT INTO STONE WALLS! ISNT TECHNOLOGY WONDERFUL?
BASED ON THE EXPERIENCE OF OTHER JURISDICTIONS OIL AND GAS TERMINALS BENEFIT THE COMPANIES INVOLVED, NAMELY SHELL/ENTERPRISE, STATOIL AND MARATHON IN THIS CASE.
THEY ARE GUARANTEED TO POLLUTE AND CONTAMINATE OUR AIR, SEA AND LAND ON WHICH THEY OPERATE,THEIR RECORD IN THIS REGARD IS ALREADY WELL ESTABLISHED.
THE HISTORY OF ABUSE OF AFRICAS NIGER DELTA ENVIROMENT AND OGONI PEOPLE BY SHELL AND FRIENDS IS A MATTER OF RECORD.
THIS IS JUST ONE SMALL EXAMPLE OF THE GAP BETWEEN THE CORPORATE FICTION DISPLAYED IN COMPANY BROCHURES AND REALITY ON THE GROUND.
THE SANCTIONING OF THIS PROPOSAL WOULD SOUND THE DEATH KNELL OF FARMING , FISHING AND TOURISM IN THIS AREA AND WOULD BE A CATALYST FOR FURTHER DEPOPULATION AND ISOLATION.

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IT IS REVEALING TO REALISE THAT SHELL AND CO ARE BEING SO GENEROUSLY FACILITATED BY COILLTE IN PROVIDING HUNDREDS OF ACRES FOR THE TERMINAL SITE AND NOW BORD NA MONA ARE ALLOWING THE USE OF SHRAMORE, BANGOR AS A DUMPING GROUND FOR A SIGNIFICANT PROPORTION OF THE ALMOST ONE MILLION CUBIC METERS OF BOG AND TOPSOIL.
TRANSPORT OF SUCH QUANTITIES WILL DESTROY THE ROADS CONCERNED AND BE A MAJOR DISRUPTION AND DANGER TO OTHER TRAFFIC FOR MONTHS ON END.
ONE CAN ONLY HOPE THAT COILLTE AND BORD NA MONA ARE FULLY COGNISCANT OF THE CALIBRE AND HISTORY OF THESE COMPANIES.
I WOULD LIKE TO THINK ENVIROMENTAL AND HUMAN RIGHTS RECORDS OF SHELL AND THEIR ASSOCIATES WOULD BE TAKEN INTO CONSIDERATION WHEN DOING BUSINNESS.
THE SITING OF THIS TERMINAL IN THIS RURAL UNDEVELOPED AREA IS TOTALLY INAPPROPRIATE, WHAT ARE THE BENEFITS OF A LOUD SMELLY EYESORE?
CAN WE LOOK FORWARD TO THE FUTURE SCENARIO OF A POLLUTED LANDMASS CONTAINING A HUGE TERMINAL AND PIPES, THE DESTRUCTION OF A NOW HEALTHY GLENAMOY/MUIGNABO RIVER AND SRUWADDACON ESTUARY AND THE RISKING OF THE ONLY WATER SUPPLY (CARRAMORE LAKE) USED BY THE MAJORITY OF PEOPLE IN ERRIS.
ALL BECAUSE SOME OIL COMPANIES WANT TO MAXIMIZE PROFITS AND PRETEND TO BE INTERESTED IN PLAYING THE ROLE OF GOOD NEIGHBOUR.
AS A COUNTRY WE HAVE GIVEN AWAY OUR OIL AND GAS FOR A PITTANCE, TO NOW SACRIFICE OUR LAND WATERWAYS AND AIR WOULD BE TO ADD FURTHER INSULT TO INJURY.
IT IS WIDELY BELIEVED SHELL/ENTERPRISE AND THEIR PARTNERS ARE SITTING ON HUGE UNDISCLOSED OIL AND GAS RESERVES OFF OUR COAST. I HAVE NO DOUBT THAT THE SUGGESTED HANDLING CAPACITY AND LIFESPAN OF THIS TERMINAL HAS BEEN DELIBERATELY AND VERY SUBSTANTIALLY UNDERSTATED.
YOU MAY BE INTERESTED TO LEARN THAT SHELL OIL WERE FINED FOR FALSE CLAIMS AND DEFRAUDING THE U.S. GOVERNMENT BY THE FOLLOWING AMOUNTS -
JANUARY 2001 $110,000,000 ,
SEPTEMBER 2000 $56,000,000 ,
AUGUST 2003 $49,000,000 , A GRAND TOTAL OF $215 MILLION DOLLARS IN FINES AND SETTLEMENTS WITH U.S FEDERAL AUTHORITIES. THE AUGUST 2003 FINE WAS PARTLY FOR UNAUTHORISED VENTING AND FLARING OF GAS IN THE GULF OF MEXICO.
FOR THE RECORD MARATHON OIL WERE FINED $900,000 IN 1991, THEY PLEADED GUILTY TO CRIMINAL VIOLATIONS OF CLEAN AIR ACT AT AN INDIANAPOLIS REFINERY AFTER A TWO YEAR F.B.I. PROBE INTO A MAY 26 1989 EXPLOSION AND FIRE AT A HOUSE LOCATED DOWNSTREAM FROM THEIR REFINERY. AFTER THE EXPLOSION MEASUREMENTS

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TAKEN AT THE REFINERY DISCHARGE POINT TO SEWER SYSTEM REVEALED A 100% EXPLOSIVITY.
MARATHON OIL PLEADED GUILTY TO ONE FELONY AND TWO MISDEMEANOURS. (www.corporate crime reporter .com)
THESE FEW EXAMPLES SHOULD BE HELPFUL IN GAUGING THE CHARACTER AND RELIABILITY OF THE COMPANIES WE ARE BEING SADDLED WITH.
AN BORD PLEANALA REJECTED THE SITING OF THIS MONSTROSITY IN THIS AREA AFTER CAREFUL CONSIDERATION OF ALL THE FACTS AND AFTER TAKING ON BOARD THE KNOWLEDGEABLE INPUT OF THE LOCAL POPULATION.
I RECOMMEND MAYO COUNTY COUNCIL FOLLOW THEIR EXAMPLE.

SINCERELY YOURS,

THOMAS PHILBIN.

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16th January 2004

TRANSCRIPT

The Planning Office
Mayo County Council
Castlebar
Co Mayo

Rathmichael Lodge
Shanhill
Co Dublin

Re: Shell Ireland – Corrib Project & Relating Board na Mona Peat Deposition @ Shamore

Dear Sir/Madam

I am writing this submission to you on behalf of the Glenalt Fishing Syndicate which owns the fishing rights on Carrowmore Lake & on parts of the Owenmore & Muirphin Rivers.

Our major concern is that the digging out and removal of the peat & other material at Bellanaboy, followed by its delivery & spreading at Shramore will adversely affect the water quality in the lake & the rivers, which in turn could have serious implications for the salmon & trout habitat, and obviously, therefore, for the future of the fishery.

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A) Carrowmore Lake

Part of the peat being extracted for the proposed terminal is land which drains into Carrowmore Lake. During the extraction the danger (and prevention) of peat, silt etc, getting into the lake must be fully addressed. Enrichment has, just last year, occurred in the lake in the summer, which we believe caused algae on the lake which effectively closed the fishery for some weeks. Peat in the lake from the extraction could cause this or some other undesirable side effects. Naturally, also in view of recent publicity at Derrybrien etc, about "torrents" of peat, there are increased concerns of something similar happening in Carrowmore during site excavation. Flows of water coming from ongoing operations must also be monitored.

B) Shramore

During the work increased levels of peat flowing into the drains is inevitable, and this will greatly increase the risk of it "finding its way" into the Owenmore and/or the Muirphin rivers. It must be born in mind also that the area is liable to have severe and damaging rainstorms, (Pullathomas 2003 and Glencullen in the 1990's are two examles). If such a storm was to occur after or during the deposition at Shramore, it could have disastrous effects. It seems that safeguards must be put in place to cater for such freak conditions.

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It would seem essential to us to ensure that in addition to the above:-

1. All barricades/filters, settling ponds are in place fully operational prior to any deposition taking place.
2. The system of drainage, settling, ponds etc must be comprehensive and complete for the whole area to prevent direct access into the river.
3. The quality of the water entering the river must be within very high quality standards and closely monitored.

We have experienced difficulties with Bord na Mona in respect of their operations in Bellacorrick over the years (e.g. filter ponds not being maintained, breaking down etc., ponds being inadequate and or insufficient in number, Derogation being obtained by Bord na Mona from the quality standards set out in their Licence etc).
For this reason we would strongly suggest that an independent outside agency (or Mayo County Council?) would be obliged to monitor and report on a regular basis (daily during the deposition?).

I am not an engineer or technical expert of any kind, but I feel since you have expertise available to you who would address the points raised in this letter and "translate" them into technical/engineering terminology and standards. I enclose a cheque for €20 which I understand is required with my submission.

Yours faithfully

JRB Hewat
Glenalt Syndicate

P.S.
Plate 3.2 on page 3-8 of the EIS shows a "good pond". We have photographs of "bad" ponds with barriers broken down and/or water flowing around the sides of the exit etc. Hence the above comments.

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Rathmichael Lodge,
Shanhill
Co. Dublin
16th January 2004

Ltr: 4.28
€20 cheq
20/1/0

The Planning Officer,
Mayo County Council,
Castlebar
Co. Mayo

COMHAIRLE CHONTAE MHUIGHEO
RECEIVED
20 JAN 2004

03/3343

Re: Shell Ireland - Corrib Project
and relating Bord-na-Mona peat deposition @ Shramore.

Dear Sir/Madam,

I am writing this submission to you on behalf of the Co. Walk Fishing Syndicate which owns the fishing rights on Carrowmore Lake and on parts of the Owenmore and Muingin rivers.

Our major concern is that the digging out and removal of the peat and other material at Bellanaboy, followed by its delivery and spreading at Shramore will adversely affect the water quality in the lake and the rivers, which in turn could have serious implications for the salmon and trout habitat, and obviously therefore for the future of the Fishery.

In particular our principal concerns would be:-

a) Carrowmore Lake

Part of the peat being extracted for the proposed terminal is land which drains into Carrowmore Lake. During the extraction the danger (and prevention) of peat, silt etc getting into the lake must be fully addressed. Enrichment has, just last year, occurred in the lake in the summer, which we believe caused algae on the lake which effectively closed the fishery for some weeks. Peat in the lake from the extraction could cause this or some other undesirable side effects. Naturally also in view of recent publicity at Derrybrien etc about "torrents" of peat, there are increased concerns of something similar happening in Carrowmore during site excavation. Flows of water coming from ongoing operations must also be monitored.

b) Shramore

During the work increased levels of peat flowing into the drains is inevitable, and this will greatly increase the risk of it "finding its way" into the Owenmore

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The Bridge,
Glenamoy,
Ballina,
Co.Mayo
15-01-04.,

Mayo County Council,
Aras an Chontae,
Castlebar,
Co.Mayo.

Dear sir/madam

I am writing to you to lodge an objection to the building of a Gas refining terminal at Bellinaboy,Co.Mayo. I feel I must object to this construction for the following reasons: 03|3343

- I am a resident of the area close to bellinaboy and are concerned that emissions from the terminal will cause damage to my health as I am an elderly lady
- My house is located beside main road from Glenamoy to Bellinaboy and I am concerned about increased traffic that will be using the road should the terminal be built fri 6287 €20 00
- I am also concerned that my house is located within a ½ mile of where the terminal is to be built and that in the event of an emergency what would happen to me and my belonings
- I am concerned that some households that are situated close to the terminal are to receive compensation and as my house is situated only ½ mile from the terminal I feel I should also be compensated. 20|1|04

I am objecting to the construction of the terminal on these grounds and I hope the council will take my views on board

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Yours Sincerely

Mrs Katie Healy

Mrs Katie Healy

MAYO COUNTY COUNCIL
16 JAN 2004
PLANNING & DEVELOPMENT

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Bunowna,
Glenamoy,
Ballina,
Co.Mayo
~~08-01-04~~.
15/1/04

Mayo County Council,
Aras an Chontae,
Castlebar,
Co.Mayo.

03 | 3343

Rec: 62
€20 VC

Dear sir/madam

I am writing in objection to the proposed construction of a gas terminal at Bellinaboy, Co.Mayo. I am objecting to this project under the following grounds

- I live in close proximity to the proposed terminal and are concerned that emissions from the terminal will have adverse affects on the health of my children and I
- The area I live in is quite scenic and I am concerned that the construction of this terminal will create an eyesore and will not fit in with its surroundings.
- Due to the location of my house I am concerned that more than likely the value of my property will decrease with the construction of such a large industrial project so close to my property
- I am also concerned that a number of households closer to the terminal are being granted compensation. Due to my house being located only a ½ mile from the terminal I believe that I am entitled to compensation also.
- The final subject about this terminal that concerns me is that my house is located approximately a ½ mile from the proposed location of the terminal and I am concerned that in the event of an emergency at the terminal there is not a correct plan of action in place to ensure the safety of my household and other households in the locality

20/1/04

I hope the council will take my objections on board

Yours Sincerely

Nancy Healy

MRS Nancy Healy

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MAYO COUNTY COUNCIL
RECEIVED
16 JAN 2004
PLANNING & DEVELOPMENT

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Moran Joe

From: Condon John
Sent: 19 January 2004 08:49
To: Moran Joe; Douglas Iain
Subject: FW: attention Mr. Ian Douglas Planning P 03/3343

-----Original Message-----
From: Monica Muller [mailto:monicamuller@eircom.net]
Sent: 18 January 2004 18:06
To: Co_Secretary
Subject: attention Mr. Ian Douglas Planning P 03/3343

P 03/3343 Shell Refinery Application

Dear Mr. Douglas,
thank you for your letter dated 15 Jan 2004 including the CD of correction and missing files not submitted by the developer when making the application and not verified by the planning section at 17 Dec 2003.
I have to make the following comments:

There is no facility in the Planning Acts that I could find, for two dates of submission. If there are, please point the relevant section out to me, i.e. your reasoning for the two deadlines. It would appear that the public now has two dates to make submissions but I have seen no public announcement by Mayo County Council to inform the public.

As the fundamental part of my final submission will be the interaction between the relevant parts of this application it is impossible to do this in two parts it would indeed be tantamount to 'project-splitting'.
I intend to make my final submission/observation in regard to the EIS accompanying the planning application for a refinery by the now extended date, 19 Feb 2004.

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Yours sincerely,

MONICA MULLER
ROSSPORT
BALLINA
CO. MAYO
I attach extract from Irish Planning Law Fact, Grist, Berna, BL, Macken, J. SC, 2003

1.5 Third-party objections or submissions

The rights to make an objection or submission in respect of a development and/or the right to appeal the decision of the planning authority have been significantly altered under the Planning and Development Acts 2000 - 2002. Any person(s) wishing to make an objection or submission on a planning application generally must do so within the first five weeks, and the appropriate fee must be included with any such submission or objection (see art.29). An additional period to make submissions is provided for (under art.35(1)(c)(v)) where a further information request from the planning authority has resulted in a response which alters the original proposals to such an extent as would require new public notices.

Any submission or observation must contain details in respect of the name, address, and relevant contact and correspondence details of the person or body making the submission or observation. Such submissions and observations must be acknowledged in writing as soon as is reasonable after their receipt of same by the planning authority.

19/01/2004

SCANNED

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Under s.33(3)(b), the planning authority must have regard to all submissions or observations made in accordance with the regulations. Submissions received after the five-week period cannot be accepted by the planning authority and must be returned.

A third-party appeal in respect of a decision made by the planning authority will only be accepted where accompanied by a valid acknowledgement of their objection to the planning authority (s.37(1)(a)). This point can not be overemphasised.

Of some concern, perhaps, is the fact that, while provisions exist for third parties to appeal a development amended by condition (which would originally have gone unchallenged) (see Para. 5:1.5.1 below), no such objection or appeal provision appears to have been made in respect of a development altered by reason of further information submitted and accepted by the planning authority unless the planning authority considers the additional information submitted to be significant. Therefore, in the interest of preserving the public's rights in respect of "appeal provisions", it is advisable that the planning authority errs on the side of caution, ensuring "due public notice" is given when considering whether additional information is significant or not.

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Attached letter sent to the following people by registered post 15th January 2004

Mr Padraic Larkin
EPA
Johnstown Castle Estate
Wexford

Mr Seamus Murphy
Fire Station
Castlebar
Co Mayo

Mr Tom Cooney
Aviation Authority
Hawkins Street
Dublin 2

Breda Holly
Dept. of Marine
Leeson Lane
Dublin 2

Treasa Langford
Duchas
7 Ely Place (3rd Floor)
Dublin 2.

Mr Iain Lumley
An Taisce
The Tailors Hall
Back Lane
Dublin 2

Mr Vincent Roche
NWRFB
Ardnaree House
Abbey Street
Ballina
Co Mayo

Ms Monica Muller
Rossport
Ballina
Co Mayo.

Mr Mike Cunningham
Garryduff Park
Castlebar
Co Mayo

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Mr Liamy McNally
C/O Midwest Radio
Ballyhaunis
Co Mayo

Mr King
Aughoos
Ballina
Co Mayo

Mr Martin McManomon
Glenturk
Bangor Erris
Co Mayo

Edward Moran
Chapel Street
Belmullet
Co Mayo

Joe McEvoy
Laragh Lodge
Curraghbeg
Ardee
Co Louth

Mary McCarthy
Barrack Street
Belmullet
Co Mayo

Prof Patrick Flanagan
Dept. of Geography
U.C.C.
Cork



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15th January 2004

P03/3343 Shell E&P Gas Terminal at Bellanboy

Dear……,

The applicant has brought to our attention that a number of files were inadvertantly omitted from the digital version of the EIS given to Mayo County Council on CD and copied to you.

The missing files, contained in the enclosed CD and labelled to match the Folders contained in your earlier CDs are as follows:

VOLUME 1.

Appendix 1:
Geology, Hydrogeology and Global Stability Report:
RP004_Issue2_01_Geology Hydrogeology Global Stabil.pdf

Appendix 2:
Earthworks Report:
RP005_Issue 2_C1157-10_15_App 4A - Max Cut 1_1.pdf
RP005_Issue 2_C1157-10_16_App 4A - Max Cut 1A_1A.pdf
RP005_Issue 2_C1157-10_17_App 4A - Max Cut 2-2.pdf
RP005_Issue 2_C1157-10_18_App 4A - Max Cut 3-3.pdf
RP005_Issue 2_C1157-10_19_App 4A - Max Cut 4_4.pdf
RP005_Issue 2_C1157-10_20_App 4A - Max Cut 4a_4a.pdf
RP005_Issue 2_C1157-10_21_App 4A - Max Cut 5.pdf
RP005_Issue 2_C1157-10_22_App 4A - Max Cut 6.pdf
RP005_Issue 2_C1157-10_23_App 4A - Max MinSoil Cut 1_7a.pdf
RP005_Issue 2_C1157-10_24_App 4A - Max MinSoil Cut 1a_7.pdf
RP005_Issue 2_C1157-10_25_App 4A - Max MinSoil Cut 2_8.pdf
RP005_Issue 2_C1157-10_26_App 4A - Max MinSoil Cut 3_9.pdf
RP005_Issue 2_C1157-10_27_App 4A - Max MinSoil Cut 4_10.pdf
RP005_Issue 2_C1157-10_28_App 4A - Max MinSoil Cut 5_11a.pdf
RP005_Issue 2_C1157-10_29_App 4A - Max MinSoil Cut 5a_11.pdf
RP005_Issue 2_C1157-10_30_App 4A - Max MinSoil Cut 6_12.pdf
RP005_Issue 2_C1157-10_31_App 4A - Max MinSoil Cut 7_13.pdf
RP005_Issue 2_C1157-10_32_App 4A - Max MinSoil Cut 8_14.pdf

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VOLUME 2.

Revised Chapter 5.

There is a Chapter 5 contained on the CD however it is an old draft of this chapter. This new file which contains the most recent census data is the version of chapter 5 contained in the hard-copy of the EIS.

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Additional Note:
Waste licence application drawing WLA_300series.pdf and WLA_EIS 200series.pdf were sent to you on disk in error - these do not form part of the planning application or EIS.

To ensure that any submission you may wish to make in relation to the missing files can be considered, you should make a submission based on the information contained in the original discs before 30th January 2004 in the normal way. Submissions on the missing files up and including 19th February 2004 will be considered by Mayo County Council as supplementary to your first submission. This is to ensure that the Council can give consideration to your full submission.

Should you have any questions or queries please contact Iain Douglas, Senior Planner.

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Douglas Iain

From: Gavin Lawlor [gavin@tpa.ie]
Sent: 13 January 2004 16:59
To: Douglas Iain
Subject: Corrib

Dear Iain

Further to our telecon, we have checked the digital files sent to you on disk. The following is the result:

Volume 1 (RSK); Complete on disk

Volume 1 Technical Appendix:
Files missing refer to list below:

Geology, Hydrogeology and Global Stability Report:
RP004_Issue2_01_Geology Hydrogeology Global Stability.pdf - **This has been sent to you already**

Earthworks Report:
RP005_Issue 2_C1157-10_15_App 4A - Max Cut 1_1.pdf
RP005_Issue 2_C1157-10_16_App 4A - Max Cut 1A_1A.pdf
RP005_Issue 2_C1157-10_17_App 4A - Max Cut 2-2.pdf
RP005_Issue 2_C1157-10_18_App 4A - Max Cut 3-3.pdf
RP005_Issue 2_C1157-10_19_App 4A - Max Cut 4_4.pdf
RP005_Issue 2_C1157-10_20_App 4A - Max Cut 4a_4a.pdf
RP005_Issue 2_C1157-10_21_App 4A - Max Cut 5.pdf
RP005_Issue 2_C1157-10_22_App 4A - Max Cut 6.pdf
RP005_Issue 2_C1157-10_23_App 4A - Max MinSoil Cut 1_7a.pdf
RP005_Issue 2_C1157-10_24_App 4A - Max MinSoil Cut 1a_7.pdf
RP005_Issue 2_C1157-10_25_App 4A - Max MinSoil Cut 2_8.pdf
RP005_Issue 2_C1157-10_26_App 4A - Max MinSoil Cut 3_9.pdf
RP005_Issue 2_C1157-10_27_App 4A - Max MinSoil Cut 4_10.pdf
RP005_Issue 2_C1157-10_28_App 4A - Max MinSoil Cut 5_11a.pdf
RP005_Issue 2_C1157-10_29_App 4A - Max MinSoil Cut 5a_11.pdf
RP005_Issue 2_C1157-10_30_App 4A - Max MinSoil Cut 6_12.pdf
RP005_Issue 2_C1157-10_31_App 4A - Max MinSoil Cut 7_13.pdf
RP005_Issue 2_C1157-10_32_App 4A - Max MinSoil Cut 8_14.pdf

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Total of 18 Files these are being sent to you in 18 separate e-mails following this one which will be numbered 1 of 18, 2 of 18 etc..

Volume 2 (TES):

This is complete on the disk, however, Ch5 is an old draft of this chapter which does not contain the most recent census data.
Revised Chapter 5 attached to this e-mail.

Also we have noticed that many of the files related to this volume on your web site are too large to download. We propose to send up a complete EIS CD which is more user friendly and covers the complete TES EIS to replace the files currently there.

Finally it appears that the waste licence application drawings were sent to you on disk in error - these do not form part of the planning application or EIS and can be removed. These are as follows:

14/01/2004

EPA Export 08-07-2014:23:49:48

WLA_300series.pdf -
WLA_EIS_200series.pdf -

I trust that the above is in order, we will also be sending you revised disks to take account of all of the above.

Gavin Lawlor

Notice of Change of Address

Effective from: Monday, 17 November 2003

New Address: 8 - 11 Lower Baggot Street
Dublin 2

Telephone, Fax and email remain the same:
Tel 01 478 6055
Fax: 01- 478 6054
Email: info@tpa.ie

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14/01/2004

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BOURKE, CARRIGG & LOFTUS
SOLICITORS

Kevin P. Loftus B.A.
Notary Public
Leo J. Loftus B.A.
Peter A. Loftus B.A.
Rosemarie J. Loftus B.C.L.

Ballina,
Co. Mayo.

DX 14 003 Ballina

Telephone (096) 21455
Fax (096) 22336

RCD 6237
€20
15/1/04

When Calling please ask for: Peter A. Loftus

Your Ref:
Our Ref: PAL//S541A

03/3343

12 January 2004

Mayo County Council,
Aras an Chontae,
Castlebar,
Co. Mayo.

RE: OUR CLIENTS: JAMES AND KATHLEEN HEALY
BUNNOWLA, GLENAMOY, BALLINA, COUNTY MAYO

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Dear Sirs,

We confirm that we act on behalf of the above named James and Kathleen Healy who has consulted us in relation to their concerns regarding a proposed submission of a planning permission by Shell E.&.P. (Ireland) Limited in respect of the proposed Gas Terminal located adjacent to their property.

Our clients are concerned with the proximity of the proposed siting of the Gas Terminal and the implication that it will have in relation to the location fo their dwellinghouse.

In this regard we have been instructed by our client to write to you requesting that our clients' concerns would be noted and that a copy of any decision with regard to planning permission would be forwarded to us on it's issue. In this regard we enclose herewith cheque in the sum of €20.00

We await hearing from you.

Yours faithfully,
BOURKE CARRIGG & LOFTUS.

MAYO COUNTY COUNCIL
14 JAN 2004

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Rec. 6236
€20 15/1/04

Mayo County Council
Planning Department
Aras an Chontae
Castlebar
Co. Mayo

Mr David Dendy
The Old Rectory
Pollatomish
Ballina
Co. Mayo

7th January 2004

Ref. : Planning Application to Mayo County Council
Shell E&P Ireland Limited / Corrib Gas Field
Gas Reception Terminal at Bellagelly South, Bellanaboy, Co. Mayo
and related workings at Srahmore / Attavally, Bangor, Erris, Co Mayo

03/2343

Dear Sir/Madam

Please accept my formal objection to the revised planning permission application made by Shell E&P Ireland Limited, referenced above.
I enclose a cheque for €20 which I believe is the sum now required to accompany any formal objection.

Many of my concerns remain as stated in my objection to the original plan for this building, as stated in my formal objection to yourselves, dated 21st May 2001.
These concerns are still applicable in spite of the revised size of the terminal building.
Many of these concerns were also raised to some extent at the oral hearings in Ballina.

However there is now a new factor in the revised planning application which I find so alarming that it can, on its own, form the main tenet of this, my current, objection:
I refer, of course, to the proposal to remove the 'problematic peat bog' from the intended building site at Bellanaboy, transport it over 11km, and spread it over the Bord Na Mona cut-away bogland at Srahmore.
According to the information that was recently presented by Shell/ Enterprise/ Bord Na Mona at Teach Iorrais, this will necessitate up to 400 truck movements a day for a 25 week period.
By my calculations, given an average working day, this will mean a truck movement at least every 80 seconds.
Given the nature of the road to be used, I predict that the road will begin to collapse after about 2 days of usage. I base this prediction on the observations I have carried out over the last four years.
This road will also become dangerous for other traffic as it is in many places narrow with soft margins. Currently it is fairly hazardous if one meets a truck of any size at particular points on the road. It will also, despite the 'truck cleaning' envisaged, become covered with peat mud and dust.
In effect this road will become a rough haulage road for at least 6 months. It will be too busy and dangerous for normal traffic to reasonably consider using it. The consequent displacement of this normal traffic will cause additional problems. The only viable alternative route between our area and Bangor is via the Barnatra / Gortmore road, a largely single track road with many sharp and dangerous bends which runs on the other

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side of Carrowmore lake. Other than using this, trips to and from Bangor will have to be via Belmullet!

I could go on but I will save the details for the oral hearing which must surely result from this new and onerous design.

Suffice to say in summary that I find this new proposal quite incredible.
We were told at the original hearing not to be concerned too much about the local road infrastructure as (excuse me while I paraphrase)

'once the site machinery is on site it will stay there, i.e. all heavy machinery movements will be taking place on-site and will not therefore be causing damage to local roads'

Now we find a complete 'volte-face' and are faced with 50,000 heavy truck movements on inadequate local roads, in addition to the terminal building more or less as originally proposed, with all the other inherent problems.

I await the decision of the council with interest.

Yours sincerely

D. J Dendy

David Dendy

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Mayo County Council
Planning Section
Aras An Chontae
The Mall
Castlebar
Co. Mayo

Thursday, 01 January 2004
Submission/Objection Planning file: P 03/3343

Application for: construct gas terminal for the reception and serapation of gas from the Corrib gas field, and for a peat deposition site, respectively. The development will consist of the concurrent development of two sites located 11 kilometres apart, approximately, and identified as the site of the gas refinery for the reception and separation of gas from the Corrib gas field in the townland of bellagelly south and the site of the peat deposition site in the townlands of Srahmore and Attavally, Bangor Erris. The development at the Bellagelly south site will consist of: a gas refinery for the processing and refining of gas including plant and equipment; provision of 4,935 sq m (gross floor area), approximately, of buildings; access roads; 40 no. Car parking spaces; and ancillary developments, of which 13 ha, approx, will be developed in respect of the gas refinery's footprint. The proposed development of the Bellagelly south site will also consist of the excavation and removal of 450,000 cubic m and transfer by truck on public road.

By: SHELL E & P IRELAND LIMITED
At: BELLAGELLY SOUTH SRAHMORE ATTAVALLY
Reg. Ref. No. Mayo County Council 03/3343

€20 –
Rno 6005
6/1/04

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Dear Sir/Madam,

The Irish Times, 5 Dec 2003, quotes the Irish Planning Institute and it's president, Mr. Ian Douglas, as stating "There is no doubt that applicants who are well-connected politically or skilled in the art of lobbying have a much better chance of success in applying for a one-off house than applicants without these connections or skills." The IPI president, Ian Douglas, is quoted that it was "critical to the future of the Irish countryside" …to make a clear distinction between urban areas and their rural context.

Assuringly the Irish Planning Institute stated unambiguously that:

The professional Planning Institutes have three main functions to perform:-

1. *To ensure that the profession of planning is practised to its fullest potential and to the highest standards throughout the country,*
2. *To ensure that members practise the profession to the best of their abilities, and*
3. *To promote the development and implementation of good planning policy.*

The survey of members, carried out for the purposes of this report, indicates that planning often is not practised to its fullest potential in Ireland. The survey expresses a feeling that members are being constrained (and allowing themselves to be constrained) within the

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procedural elements of the planning system, rather than focusing on their professional skills of strategic thinking and development of land use and resource solutions.
(Securing the Future for Planning in Ireland, The Irish Planning Institute and the Royal Town Planning Institute, May 2002)
I can only hope that these aspirations will be followed by Mayo County Council.

As was evident from the previous, refused planning application (01/900) for a gas refineryfor the same site, the assessment which under the 1999 European Community Environmental Assessment Regulations was to have been carried out by the planning authority (Mayo County Council) was in fact not carried out. This resulted in Mayo County Council giving permission for a 'concept' as judged by An Bord Pleanala.

The conditions attached to the grant of permission by Mayo County Council were written by Michael Daly, Department of (then) Marine and Natural Resources and sent to Mr Des Mahon, County Manager on the 20th June 2001 AO5/02 received in the County Manager's Office 22nd June 2001.

The (then) Minister for Marine and Natural Resources acknowledged in the Dail that a meeting took place with Mayo County Council officials and his department, no minutes were taken or any reference to this meeting were put on the public planning file thereby depriving the public of participation in a planning application by virtue of denial of information.

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I am as unhappy and critical of the current state of planning as the Irish Planning Institute and it's president. I therefore write and submit my objection to this planning application with foreboding and apprehension, not to say suspicion of a foregone conclusion to the application. I refer you to an article in the Irish Times by Lorna Siggins: Shell to apply again for Corrib refinery planning permission which states that *"Mayo County Council has already given tactic support to the new submission by offering to improve the road from Bellanaboy to the T58 secondary route near Bangor Erris."*

I reluctantly enclose the Euro 20 fee for 'consultation'. This fee is the subject of a recent opinion from EU Commissioner for the Environment to the Irish Government. Please note that it is my opinion that my submission on the previous file was not taken into consideration by anybody in the planning department of Mayo County Council, nor were any other submissions against the proposed development.

Flaw of the application P03/3343
Article 34 (6a) of the Planning and Development Act 2000 clearly states that the planning authority may only grant planning permission where a development materially contravenes the County Development plan if a motion 'materially contravening the development plan' has been passed under Article 34 (6) (B).
It is my submission that this proposed development materially contravenes the County Development Plan. Strangely the developer does not seem to be aware of the new development plan, referencing only the 1992 plan in the EISs which seems to indicate a certain disregard, arrogance or carelessness.
I refer you to the Inspector's Report, An Bord Pleanala (PL 16.126073) re: P1/900, (same site as the present application), starting page 168 *"Accordingly, it is considered that the proposed development would be contrary to the proper planning and development of the area."*

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3. *The proposed large industrial development would be located in an elevated and unspoilt rural setting in an area of scenic and ecological value lacking in public services and essential facilities. It is a policy of the planning authority, as set out in the current Mayo County Development Plan, to protect the natural environment and to enhance the amenities of the county. In addition, it is a policy to ensure that the availability of infrastructural facilities is not a limiting factor in the promotion of industrial development.*

It is considered that the proposed development would conflict with the policies of the planning authority by reason of:

(a) the imposition of a large industrial use in an unserviced, remote, rural location approximately 8 kilometres from the landfall;
(b) the visual obtrusiveness of the development by virtue of the siting of a large industrial complex on a prominent, open and exposed bogland hill and the intrusion that would be caused, resulting in a significant deterioration of the landscape character of the area;
(c) the irreversible alteration of this landscape arising from the site development works proposed;
(d) the degradation of the fragile ecology of the area arising from the intensive industrial activities of the construction and operational phases of the development;
(e) the environmental and public safety implications derived from the construction works; and
(f) the significant increase in traffic volumes and HGV movements at the construction stage onto a road network that is substandard in width, pavement and alignment.

It is considered, therefore, that the proposed development would not be in accordance with the principles of sustainable development and would be contrary to the proper planning and development of the area.

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I say that this application is not materially different from the previous one but with the added dimension of proposed transportation of 450 000 m3 peat via a local public road and a change to the previous traffic proposals.

In this context I wish to add to the inspector's points that the upgrading of the road tactically agreed by Mayo County Council will directly affect the status of a Special Area of Conservation. I refer you to Mayo County Development Plan, Natural Heritage, EH-NH 1: *It is an objective of the Council to protect and conserve areas designated as candidate Special Areas of Conservation, Special Protection Areas and proposed Natural Heritage Areas listed in Appendix V or any additional such areas that may be so designated during the life time of the plan.*

Therefore on this point alone the proposal materially contravenes Mayo County Development Plan.

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EIS

The documents submitted as an EIS by the developer are factually incorrect as they state that there "will be no temporary impacts on any designated conservation areas, as all are located at some distance from the development and as such are physically isolated." Interestingly no maps of the relevant SACs are submitted.
The EIS is fundamentally flawed because the upgrade of the road 'tactically' agreed by Mayo County Council to facilitate this development and only to facilitate this development as opposed for the public good, has not been included in the EIS.

The source of the required imported materials (as listed in the EIS) has not been stated apart from saying 'local source'. I would like to remind Mayo County Council that An Bord Pleanala refused to assess the application for (local) Lennon's Quarry because the development at Lennon's quarry is un-authorised development and an application for the retention of the un-authorised development has not been submitted. (At the ABP oral hearing for the previous application it was stated that the 'local source' was Lennon's Quarry and the material used by Shell/EEI in the carrying out the development in Glengad was indeed sourced from Lennon's Quarry.)

Waste

The EIS states that waste will go to 1 of 3 places:

1. To be used as construction material at the proposed wind farm at the Oweninny site.
2. To be used as construction material at an alternative site.
3. To be disposed of at an appropriate landfill site.
4.

Relevant to 1. I can't find no reference in the EIS for the importation of waste material for the wind farm therefore this would be an un-authorised development at the Oweninny wind farm site.
Relevant to 2. It would appear that this is a "concept" with no data.
Relevant to 3. I would like to know which appropriate landfill site is envisaged and would it be capable of taking the amount of material.

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Traffic

The traffic movements of both the resources used (imported) and waste generated (exported) other than the peat have not been included in the EIS. An EIS shall include ALL the data and resulting effects.
Mayo County Council has road reports but these are not included in the EIS or referred to. In fact there appears to be conflicting assessments and requirements by Mayo County Council which would endanger the public.

The proposed development requires the material alteration of an IPC Licence (IPC 505 available on the EPA web site), a fact not included in the newspaper or site notice.

The proposed development of the refinery requires an IPC Licence. This has not been applied for.

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Having arrived at the foregoing conclusions after a first perusal of the EISs it is clear to me that the proposed development materially contravenes the Country Development Plan and can not be considered a proper planning and development of the area. I do not intend to make any further submission until the planning authority has sought and received further information from the developer to clarify the missing data and any other missing information as found by the planning department.

If Mayo County planning section had taken into consideration the submissions of the public the lengthy planning process of the previous application for the same site could have been drastically shortened and the two lengthy ABP oral hearings would have been unnecessary. The developer and the public would not had to waste time and resources.

Yours sincerely,

Monica Muller
Rossport
Ballina, Co. Mayo

PS
I attach for your convenience the recommendation of Inspector Kevin Moore, ABP, the final recommendations of Mr. Ball and the Bord's Directions on the previous application to build a gas refinery at the same location.

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An Bord Pleanala

14.0 CONCLUSION AND RECOMMENDATION

At a time when the Board is now required, in accordance with the Local Government (Planning and Development) Act, 2000, to have regard to the proper planning and *sustainable* development of an area in which a development is proposed to be constructed, it is my submission that the proposed development of a large gas processing terminal at this rural, scenic, and unserviced area on a bogland hill some 8 kilometres inland from the Mayo coastland landfall location, with all its site development works difficulties, public safety concerns, adverse visual, ecological, and traffic impacts, and a range of other significant environmental impacts, defies any rational understanding of the term 'sustainability'. It is an irony that this large industrial proposal is linked with a natural gas resource, the exploitation of which adheres to the concept of sustainability.

I note the different reponsibilities for the range of activities associated with the development of the Corrib Gas Field - for seabed, landfall, overland pipelines, and terminal. If there is to be any merit in permitting the splitting of this overall project into its various component parts and permitting separate independent assessments by various agencies, then the Board should not be constrained by any decisions that may or may not have been made by other agencies to date, in my opinion. From my perspective, to take a different view from this is:

1. to present a view that the terminal development is a *fait accompli*;

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2. to indicate that the issue of project-splitting and dissatisfaction therewith, strenuously argued by the third party appellants, has significant merit; and
3. to cloud the serious planning issues required to be assessed in this instance.

If it was to be considered that this development is a *fait accompli* because of any recent approval associated with the overall development, then in my opinion one must conclude that:

1. The serious consideration of the siting of the terminal proposal, in the interests of the proper planning and sustainable development of the area, has been completely stymied;
2. One completely ignores the wholly inappropriate choice of site for this large industrial complex in my view; and
3. The issue of project splitting and the ability to properly undertake a thorough and independent assessment of clearly defined, separable components of the overall development is seriously questionable.

It is of significance to remember that the development of this gas processing terminal at this time and in this form is not of 'national' strategic importance. This is a critical point. The planned developments for the improvement of gas infrastructure in Ireland are in place or are currently being put in place by Bord Gais. The proposed development under appeal allows a reserve to be exploited that would feed an estimated 60% of the resource into the national network and out of the West and North-West Regions. The lack of any benefits to these regions (outside of Galway) is compounded by the wholly inappropriate site proposed to be developed. There is no merit in permitting this large industrial development on the wrong site. It is critically important to apply the best development concept and to seek out a terminal site that minimises such adverse environmental impacts that would arise with the current development proposal. In my opinion, the current proposed site is unequivocally an incorrect choice.

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Having regard to my assessment, I recommend that permission be refused for the following reasons:

1. It is an objective of the National Development Plan 2000-2006 to foster balanced regional development. Furthermore, it is a policy of Mayo County Council, as set out in the current Mayo County Development Plan, to endeavour to assist in the proper exploitation of the natural resources of County Mayo in order to maximise employment opportunities and to reduce emigration.

   The proposed development of an onshore gas processing terminal to form part of the overall development of the Corrib Gas Field, resulting in the benefits derived from the use of this natural energy resource being utilised exclusively outside of County Mayo, at a time when there is no commitment to an expansion of the gas distribution network in this area, and when specific development works are being put in place to meet foreseeable estimated national demands for gas, would be contrary to the objective of fostering balanced regional development and would conflict with the policy of assisting

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in the proper exploitation of natural resources in order to maximise employment in County Mayo.

Accordingly, it is considered that the proposed development would be contrary to the proper planning and development of the area.

2. The Board is not satisfied, on the basis of the submissions made in connection with the planning application and appeal in regard to the development concept proposed and the constraints placed by the limitation of the considerations of landfall and terminal site alternatives, that the remote siting of an onshore processing terminal 8 kilometres inland from the landfall constitutes orderly development. Furthermore, the Board is not satisfied, having regard to the significant adverse environmental effects of the proposed terminal development, that the development as proposed constitutes the optimum solution to providing a reception facility for gas from the Corrib Field. The development would, thereby, be contrary to the proper planning and development of the area.

3. The proposed large industrial development would be located in an elevated and unspoilt rural setting in an area of scenic and ecological value lacking in public services and essential facilities. It is a policy of the planning authority, as set out in the current Mayo County Development Plan, to protect the natural environment and to enhance the amenities of the county. In addition, it is a policy to ensure that the availability of infrastructural facilities is not a limiting factor in the promotion of industrial development.

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It is considered that the proposed development would conflict with the policies of the planning authority by reason of:

(a) the imposition of a large industrial use in an unserviced, remote, rural location approximately 8 kilometres from the landfall;
(b) the visual obtrusiveness of the development by virtue of the siting of a large industrial complex on a prominent, open and exposed bogland hill and the intrusion that would be caused, resulting in a significant deterioration of the landscape character of the area;
(c) the irreversible alteration of this landscape arising from the site development works proposed;
(d) the degradation of the fragile ecology of the area arising from the intensive industrial activities of the construction and operational phases of the development;
(e) the environmental and public safety implications derived from the construction works; and
(f) the significant increase in traffic volumes and HGV movements at the construction stage onto a road network that is substandard in width, pavement and alignment.

It is considered, therefore, that the proposed development would not be in accordance with the principles of sustainable development and would be contrary to the proper planning and development of the area.

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4. Having regard to the provisions of Directive 96/82/EC ("Seveso II") in relation to land use planning (Article 12) and Circular Letter PD 6/99 from the Department of the Environment and Local Government and having regard, in particular, to the submissions from the National Authority for Occupational Safety and Health, the designated Central Competent Authority for the purposes of the Directive, the Board is not satisfied, on the basis of the submissions made in connection with the planning application and the appeal, that the proposed development would not give rise to an unacceptable risk to members of the public due to the proximity of the terminal site to residential properties and areas of public use to which the Directive applies.

5. Having regard to the inadequacy of site investigations and detailed designs relating to the proposed peat repositories, the likely instability of the proposed containment bunds and the waste peat to be stored in the peat repositories, and the consequent safety risk to the local community and the pollution risk arising therefrom, the Board is not satisfied that the site development works can be undertaken without undermining the safety of road users and causing structural damage to the adjoining Regional Road R314 and to adjoining properties. The proposed development would, therefore, endanger the health and safety of the general public in the vicinity of the site, seriously injure the amenities of property in the vicinity, and adversely affect the use of the regional road.

6. It is a policy of the planning authority, as set out in the current Mayo County Development Plan, to protect the Carrowmore Lake area of outstanding natural beauty, designated an Area of Special Scenic Importance. It is also an objective to strictly control development which might prove injurious to the amenity value of this Area. Furthermore, it is an objective to preserve the designated highly scenic views in an easterly direction across Carrowmore Lake. These policies and objectives are considered reasonable. It is considered that the siting of the proposed large industrial development to the east of Carrowmore Lake in a prominent and visible location would constitute a highly obtrusive development in the vicinity of Carrowmore Lake, would detract from the rural character and scenic amenities of this area of outstanding natural beauty, and would interfere with protected views. Thus, the proposed development would seriously injure the amenities of the area, would conflict with the policy of the planning authority, and would contravene materially the objectives of the current Mayo County Development Plan. The development would, therefore, be contrary to the proper planning and development of the area.

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Kevin Moore
Senior Planning Inspector
May, 2002.

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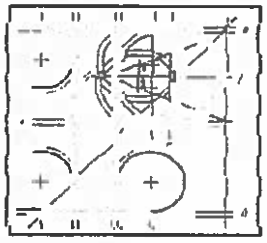
REPORT FOR AN BORD PLEANALA
March 2003

By
David M. Ball Hydrogeologist

In making this statement I am also mindful of the recent Reasoned Opinion by Margot Wallström (July 2002) addressed to Ireland 'on account of its failure to fulfil the obligations under the environment impact assessment directives'. This opinion criticised Ireland for granting permission for major projects with 'post-consent conditions', that seek to redress significant uncertainties in the information presented prior to consent.

Therefore I do not recommend that permission is granted for this development with conditions. The site is unsuitable.

An Bord Pleanála



Board Direction

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Ref: 16.126073

The submissions on this file and the Inspector's reports were further considered at Board meetings held on 28th and 29th April 2003.

Having visited the site and having considered all of the submissions on the file and the Inspector's and consultant's reports the Board decided, unanimously, to refuse permission in accordance with the recommendations generally, the reason for refusal being as set out in the draft Schedule below.

SCHEDULE

The proposed development involves the excavation of approximately 650,000 cubic metres of peat and other unsuitable materials from the site of the gas processing terminal and the removal of the peat and other materials to adjoining repositories and overlaying them on an existing blanket bog of variable thickness on a sloping site above the R314 Regional Road.

Having regard to –

- the contours of the area of the repositories,
- the amount and pattern of rainfall in the area,
- the characteristics of the disaggregated peat,
- the method proposed for the moving of material to and within the repositories,

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- the details of the system for retaining the deposited materials.

the Board considers that the proposed surface drainage system would be ineffective in ensuring the integrity of the peat repositories as permanent structures for the retention of peat and other unsuitable materials.

Consequently, the Board considers that both of proposed repositories have a high probability of failure and that the proposed development would constitute an unacceptable risk to the health and safety of the local community and of the general public on the public road in the vicinity of the site, would constitute an unacceptable risk of pollution of salmonid waters in Glenamoy River, Sruwaddacon Bay and Carrowmore Lake, and would seriously injure the amenities of property in the vicinity. The proposed development would, therefore, be contrary to the proper planning and development of the area.

Notes:

A. In deciding not to use the Inspector's recommended first reason for refusal the Board, in relation to visual impact, had particular regard to the lack of any landscape designation in the Development Plan for this area and to the existing vegetation and plantation on the site, and while accepting that the terminal would have an adverse visual impact in the area, such impact would not be so serious as to warrant a refusal of permission in this case having regard to the strategic nature of the proposed development.

In relation to the issue of alternatives, the Board considered that, at a national level, policy in relation to the provision of gas infrastructure and the timing and terms of the development of natural gas resources is a matter for the Department of Communications, Marine and Natural Resources. While the Board agreed with the Inspector that the proposed development may not constitute the optimum solution to the development of the Corrib Gas Field in terms of facilitating the provision of gas infrastructure to serve population and industrial centres in County Mayo and the North-West of the country, it does not consider that this would warrant a refusal of permission of a development that was otherwise acceptable in terms of its land use and environmental impacts. The Board considers that the proposed development would not necessarily be incompatible with the development strategies of the Mayo County Development Plan and the strategies for the BMW Region within the National Spatial Strategy.

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B. In deciding not to use the Inspector's third recommended reason for refusal, the Board had particular regard to the report of the National Authority for Occupational Safety and Health, the competent authority in relation to land use planning under Article 12 of the Council Directive 96/82EC (Seveso II), which did not recommend against the granting of planning permission subject to a number of conditions. While the conditions relating to the provision of a contaminated firewater pond and separation of tree growth from the terminal may have implications with regard to visual impact these matters were considered in assessing the visual impact of the terminal. The Board noted the applicant's proposal and the NAOSH requirement that the facility be treated as an upper tier establishment in the interests of operational safety although it strictly constitutes a lower tier facility in terms of the directive.

Finally, the Board noted that alternatives are available for the development of the Corrib Gas Field.

Board Member _____ Date 29th April 2003.
Brian Hunt

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Moran Joe

From: Condon John
Sent: 19 December 2003 15:24
To: Moran Joe
Subject: FW: attention planning office P03/3343

-----Original Message-----
From: Monica Muller [mailto:monicamuller@eircom.net]
Sent: 19 December 2003 13:42
To: Co_Secretary
Subject: attention planning office P03/3343

Dear Sir/Madam,
I request under EU 90/313/EEC, S.I. 125, 1998, European Directive as implemented into Irish Law, the following: Copies of all information, correspondence and minutes of all contacts between Shell/EEI or its agents and Mayo County Council in regard to the above application to build a gas refinery, transport of peat and deposit.
In particular I request any details of correspondence with Mayo County Council Road Section, Heritage Officer, County Manager or any one deputising on his behalf relating to the above planning file/application prior to lodgement and validation of the application, pre-planning consultations.
As the public have a legal time limit on making submissions to the above application for which I require the requested information, please treat this request as a matter of urgency.
I wish to remind you that the legislation (Freedom of Access in Environmental matters) entitles me to the information free of charge.
MONICA MULLER
ROSSPORT
BALLINA
CO. MAYO

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19/12/2003

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Moran Joe

From: Condon John
Sent: 19 December 2003 15:24
To: Moran Joe
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MONICA MULLER
ROSSPORT
BALLINA
CO. MAYO

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Shell Exploration & Production

Ap/Sm

Shell E&P Ireland Limited
Corrib House
52 Lower Leeson Street
Dublin 2
Ireland
Tel +353 1 669 4100
Fax +353 1 669 4101

MAYO COUNTY COUNCIL
1 F SEP 2003
Co. Manager's Office

Mr. Des Mahon
County Manager
Aras an Chontae
Altamount Street
Westport
Co. Mayo

12th December 2003

Dear Mr. Mahon

Subject: Corrib Natural Gas Project

Please find attached a copy of a letter issued to local stakeholders today. Please do not hesitate to contact me if you have any queries.

For inspection purposes only.
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Your sincerely

Andy C Pyle
Managing Director

Adoptus Dos.

For your attention

Dmahon
21/1/2004

EPA Export 08-07-2014:23:49:49

Shell Exploration & Production

Ap/Sm

Shell E&P Ireland Limited
Corrib House
52 Lower Leeson Street
Dublin 2
Ireland
Tel +353 1 669 4100
Fax +353 1 669 4101

12 December 2003

Subject: Corrib Natural Gas Project

I am writing to confirm that we have reached the decision to submit a new planning application for an onshore gas terminal at the Bellanaboy Bridge site. This intention will be advertised in the Irish Independent on Saturday, 13th December and the application will be lodged before the end of December.

The new application will incorporate the proposal for the removal of peat from the proposed site and deposition at the Bord na Móna cut-over peatland at Srahmore. This new proposal was well received during extensive consultations and at the recent exhibitions. Apart from the new proposal regarding peat deposition, the new application has not changed substantially from that previously considered by the relevant planning authorities.

We understand that the planning application, once submitted, will be available for members of the public to view at the Mayo County Council offices in Castlebar and the local council office in Belmullet. The local authority has also advised us that nine days will be added to the statutory period to compensate for time lost over the Christmas and New Year holiday season.

An Environmental Impact Statement (EIS) to accompany the planning application has been prepared and, under the Planning and Development Act 2000, the local authority is responsible for addressing requests for copies. Copies of the non-technical summary of the EIS will be available on our website **www.shellireland.com** once the application has been lodged.

May I take this opportunity to thank you for your support throughout 2003 and to wish you a very Happy Christmas and a Peaceful New Year.

Yours sincerely

Andy C Pyle
Managing Director

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SCANNED

Registered Office
Corrib House,
52 Lower Leeson Street,
Dublin 2, Ireland

Registered in Ireland
Number: 316588
VAT Number: IE 6336588 P

EPA Export 08-07-2014:23:49:49

BRADY SHIPMAN MARTIN

5th January 2004



Mr. David Taylor,
RSK ENSR Group PLC
172 Chester Road,
Helsby,
Cheshire WA6 0AR
England

Dear Mr. Taylor,

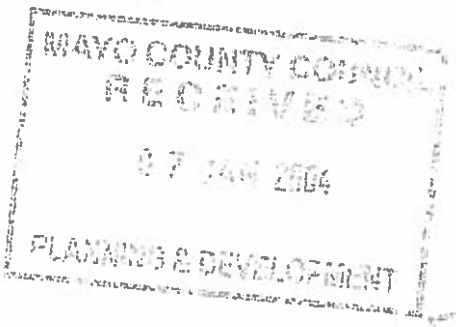
PDF versions of the photomontages for the revised Mayo Gas Terminal Application and the Srahmore Peat Receiving Site enclosed.

Regards,

For inspection purposes only.
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John Kelly
For
BRADY SHIPMAN MARTIN
Jk/dm/4282

c.c. Ms. Agnes McLaverty, Shell E&P Ireland Ltd.
Mr. Ian Douglas, Mayo County Council





PLANNERS ENVIRONMENTAL CONSULTANTS LANDSCAPE ARCHITECTS

Partners Arthur Martin David Bagnall Michael Grace Thomas Burns

Associates Dan Egan Eimear Fox David Bosonnet Kieran Rush

Consultants Hugh Brady Philip Shipman Geoff Pring

DUBLIN CORK LIMERICK

26 Temple Road, Dartry, Dublin 6, Ireland
Tel: +353 (0)1 412 5160
Fax: +353 (0)1 412 5191
e-mail: mail@bsmconsult.com

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Moran Joe

From: Condon John
Sent: 19 December 2003 15:24
To: Moran Joe
Subject: FW: attention planning office P03/3343

-----Original Message-----
From: Monica Muller [mailto:monicamuller@eircom.net]
Sent: 19 December 2003 13:42
To: Co_Secretary
Subject: attention planning office P03/3343

Dear Sir/Madam,
I request under EU 90/313/EEC, S.I. 125, 1998, European Directive as implemented into Irish Law, the following: Copies of all information, correspondence and minutes of all contacts between Shell/EEI or its agents and Mayo County Council in regard to the above application to build a gas refinery, transport of peat and deposit.
In particular I request any details of correspondence with Mayo County Council Road Section, Heritage Officer, County Manager or any one deputising on his behalf relating to the above planning file/application prior to lodgement and validation of the application, pre-planning consultations.
As the public have a legal time limit on making submissions to the above application for which I require the requested information, please treat this request as a matter of urgency.
I wish to remind you that the legislation (Freedom of Access in Environmental matters) entitles me to the information free of charge.
MONICA MULLER
ROSSPORT
BALLINA
CO. MAYO

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19/12/2003

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Moran Joe

From: Condon John
Sent: 19 December 2003 15:25
To: Moran Joe
Subject: FW: attention planning office P03/3343

-----Original Message-----
From: Monica Muller [mailto:monicamuller@eircom.net]
Sent: 19 December 2003 15:15
To: Co_Secretary
Subject: Fw: attention planning office P03/3343

Dear Sir/Madam,
I refer to my recent email to your office and wish to draw your attention to the EIS Bellanaboy Bridge Terminal, section 16 (16.4.8) *"The extent of strengthening works has been agreed as part of the pre planning discussions with Mayo County Council. Where necessary the haul route will be widened to ensure that vehicles can pass safely and again the extent of the road widening has been agreed with Mayo County Council."*
It is in this particular context that I request you to supply me with the information from your Road Section/Department, including the traffic/transportation plan as mentioned in the EIS and discussed and agreed my Mayo County Council and the Gardai.
I wish to caution Mayo County Council not to pre-empty any decision of planning application P03/3343 by carrying out road works on the stated routes prior to approval of the application, as this is part of the application.
Yours sincerely,
Monica Muller

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----- Original Message -----
From: Monica Muller
To: secretar@mayococo.ie
Sent: Friday, December 19, 2003 1:42 PM
Subject: attention planning office P03/3343

Dear Sir/Madam,
I request under EU 90/313/EEC, S.I. 125, 1998, European Directive as implemented into Irish Law, the following: Copies of all information, correspondence and minutes of all contacts between Shell/EEI or its agents and Mayo County Council in regard to the above application to build a gas refinery, transport of peat and deposit.
In particular I request any details of correspondence with Mayo County Council Road Section, Heritage Officer, County Manager or any one deputising on his behalf relating to the above planning file/application prior to lodgement and validation of the application, pre-planning consultations.
As the public have a legal time limit on making submissions to the above application for which I require the requested information, please treat this request as a matter of urgency.
I wish to remind you that the legislation (Freedom of Access in Environmental matters) entitles me to the information free of charge.
MONICA MULLER
ROSSPORT
BALLINA
CO. MAYO

SCANNED

19/12/2003

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Douglas Iain

From: Condon John
Sent: 11 January 2004 17:04
To: Moran Joe; Douglas Iain
Subject: FW: P 03/3343

-----Original Message-----
From: Monica Muller [mailto:monicamuller@eircom.net]
Sent: 11 January 2004 16:03
To: Co_Secretary
Subject: P 03/3343

Dear Sir, Madam,
I have submitted an objection to planning application P03/3343 and payed the required fee to an invalid application.

The application form submitted by Shell states on page 3: the intention to build
"a new maintenance access and maintenance road fro the R 314 to the 2 no. settlement ponds."

There is NO planning application site notice at this, a second planned opening of a road/ road access to the site for a gas refinery in Bellanaboy from the R 314, as is mandatory under Planning Regulations.

The proposed opening is clearly evident in the following drawings supply by the developer for this application:
Volume 2, Drawings:
Site Layout Plan for Bellanaboy Bridge Gas Terminal, COR-R-SP-001, Sheet 1 of 14,
road opening and security gate, leading to proposed settlement ponds.
Shell Drawing No. COR-AR-SL-003, Sheet No 1 of 1 has no "Location of Site Notice" pencilled in at this particular propose entrance/ road onto the main road, R 314.

The clear indication of site notice placement on the drawings and the erection of a site notice at the actual entrance/road site is a requirement under the Local Development and Planning Act, 2000, for a planning application to be valid.
Mayo County Council planning officials have neglected the inspection of both.

Site notices and the clear marking of such on planning drawings are compulsory for all proposed new road entries into a site for an application to be valid.

This planning application is NOT VALID in law.

MONICA MULLER
ROSSPORT
BALLINA
CO. MAYO

MS. MULLER IS MISTAKEN. ARTICLE 19(1)(c) OF THE 2001 REGS. REQUIRES A SITE NOTICE ADJOINING ENTRANCE TO THE SITE (NOT PROPOSED ENTRANCE) OR ANY OTHER ENTRANCE (AGAIN IT DOES NOT REFER TO ANY PROPOSED ENTRANCE).

I Le Dougl 96
12/1/04

12/01/2004

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COMHAIRLE CHONTAE MHAIGH EO

Aras an Chontae, Caislean a 'Bharraigh, Contae Mhaigh Eo.
Teileafóin (094) 24444 Fax (094) 23937

Your Ref. Our Ref.

9th January 2004

Micheal O Seighin
Ceathru Thaidhg
Beal an Atha
Co Mhaigh Eo

Micheal, a chara

With reference to your letter dated 5/01/04.

I am surprised to hear that your daughter was refused a copy of the EIS CDs. as they have been available for purchase since 22nd December 2003 the date they were received from the applicant. On that date copies were made for 4 people who had requested them in advance. On the 23rd December 2003 a further 25 copies were made and have been available to the public since that date, in fact, there are still 2 copies left from that batch which are available for purchase. I am having further copies made at present.

I strongly refute the allegation that there is deliberate obstruction by the Council and I believe that the fact that the Council put a copy of all documentation in the Belmullet Area Office and put the EIS on the Council web site within days of each being received, as ample evidence that the Council is endeavouring to protect and enhance public participation in the planning process.

Is mise le meas,

I Douglas

Iain Douglas
Senior Planner

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Ceathrú Thaidhg,
Béal an Átha,
Co. Mhaigh Eo.
5/01/04

Ian Douglas, Chief Planner,
Mayo Co. Co.

a chara,

I am surprised that your office continues in its pathetic practice of trying to hinder the legitimate access of the public to information on file. My daughter this evening was refused a copy of the CDs containing the EIS relevant to the latest application by Shell for planning permission for a Gas Refinery and dumping area at Ballinaboy and other far flung areas. I have a record of three other similar refusals in the days before you closed for Christmas apparently. I find it hard to believe that your office does not have the technical expertise to cut a copy of a CD and therefore this behaviour can only be deliberate obstruction.

I expect this, my complaint, to be on file, for future reference. I had hoped that this pussyfooting, which was common currency during the last two planning applications for this project, would have been dealt with by sensible management by now.

Whether relevant or not, I will be forwarding the complaint to the ombudsperson.

Micheál Ó Seighin.

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Douglas Iain

From: Douglas Iain
Sent: 09 January 2004 15:03
To: 'Michael.Ring@oireachtas.ie'
Subject: CD's for P03/3343

Dear Deputy Ring,

With regard to the availability of CD's of the EIS for P03/3343.

CD's of the EIS for P03/3343 have been available for purchase since 22nd December 2003 the date they were received from the applicant.

On that date copies were made for 4 people who had requested them in advance.

On the 23rd December 2003 a further 25 copies were made and have been available to the public since that date. At present there are 2 copies left from that batch and are available to the public. I am having more copies made at present.

From the above facts I can assure you that there is no problem with the availability of CDs of the EIS.

I do not have the CDs for the planning application documents at present only hard copy. I have not received them from the applicant. The reason I understand is IT problems in converting the large number of drawings to PDF format. I am expecting the CDs on Monday 12th January 2004.

Iain Douglas
Senior Planner

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5 MORAN

Shell Exploration & Production

Ap/Sm

Shell E&P Ireland Limited
Corrib House
52 Lower Leeson Street
Dublin 2
Ireland
Tel +353 1 669 4100
Fax +353 1 669 4101

Mr. John Condon
County Secretary
Aras an Chontae
Altamount Street
Westport
Co. Mayo

12th December 2003

Dear Mr. Condon

Subject: Corrib Natural Gas Project

Please find attached a copy of a letter issued to local stakeholders today. Please do not hesitate to contact me if you have any queries.

Your sincerely

Andy C Pyle
Managing Director

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COMHAIRLE CHONTAE MHAIGH EO
07 JAN 2004
PLANNING & DEVELOPMENT

EPA Export 08-07-2014:23:49:49

Shell Exploration & Production

Ap/Sm

Shell E&P Ireland Limited
Corrib House
52 Lower Leeson Street
Dublin 2
Ireland
Tel +353 1 669 4100
Fax +353 1 669 4101

12 December 2003

Subject: Corrib Natural Gas Project

I am writing to confirm that we have reached the decision to submit a new planning application for an onshore gas terminal at the Bellanaboy Bridge site. This intention will be advertised in the Irish Independent on Saturday, 13th December and the application will be lodged before the end of December.

The new application will incorporate the proposal for the removal of peat from the proposed site and deposition at the Bord na Móna cut-over peatland at Srahmore. This new proposal was well received during extensive consultations and at the recent exhibitions. Apart from the new proposal regarding peat deposition, the new application has not changed substantially from that previously considered by the relevant planning authorities.

We understand that the planning application, once submitted, will be available for members of the public to view at the Mayo County Council offices in Castlebar and the local council office in Belmullet. The local authority has also advised us that nine days will be added to the statutory period to compensate for time lost over the Christmas and New Year holiday season.

An Environmental Impact Statement (EIS) to accompany the planning application has been prepared and, under the Planning and Development Act 2000, the local authority is responsible for addressing requests for copies. Copies of the non-technical summary of the EIS will be available on our website www.shellireland.com once the application has been lodged.

May I take this opportunity to thank you for your support throughout 2003 and to wish you a very Happy Christmas and a Peaceful New Year.

Yours sincerely

Andy C Pyle
Managing Director

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Moran Joe

From: Michael.Ring@oireachtas.ie
Sent: 06 January 2004 16:21
To: Moran Joe
Subject: RE: CDs for P.03/3343 - Shell

Dear Joe,

I am writing with regard to the CDs for the planning application by Shell E & P
Ireland Ltd at Ballinaboy.

I understand that there are problems in getting these CDs. You might investigate this matter immediately and confirm what exactly is the problem and
when will the CDs be available.

With kind regards,

Yours sincerely,

MICHAEL RING T.D., M.C.C.
Fine Gael Spokesperson on Social & Family Affairs

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Michael Ring T.D.
Quay Street
Westport
Co. Mayo.



DÁIL ÉIREANN
BAILE ÁTHA CLIATH, 2.

Political Office:
Tel: 098-27012
Fax: 098-27644
Dáil: 01-6184367
E Mail: michael.ring@oireachtas.ie

All correspondence to be forwarded to Constituency Office

22 December 2003

Mr. Iain Douglas
Planning Section
Mayo County Council
Áras an Chontae
Castlebar
Co. Mayo

Dear Iain,

I am writing on behalf of Mr. Brendan Philbin, Rossport South, Ballina who contacted me in relation to the new planning application by Shell Ireland at Bellagelly South, Co. Mayo (P.03/3343)

Brendan is anxious to get a copy of the EIS report. How can he get it? How soon can he get it? Brendan wants to examine and read this report, as it his entitlement.

You might let me know, as a matter of urgency, where Brendan can get a copy of the EIS report for this planning application. I look forward to hearing from you and thank you for your assistance.

With kind regards,

Yours sincerely,

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MICHAEL RING T.D., M.C.C.
Fine Gael Spokesperson on Social & Family Affairs

EIS IS AVAILABLE ON CD-ROM AT MAYO CO CO HQ. NOW. HARD COPY IS BEING COURIERED FROM DUBLIN TODAY AND IS EXPECTED BEFORE 5pm.

Iain Douglas SP
23/12/03

EPA Export 08-07-2014:23:49:49

Michael Ring T.D.
Quay Street
Westport
Co. Mayo.



DÁIL ÉIREANN
BAILE ÁTHA CLIATH, 2.

Political Office:
Tel: 098-27012
Fax: 098-27644
Dáil: 01-6184367
E Mail: michael.ring@oireachtas.ie

All correspondence to be forwarded to Constituency Office

22 December 2003

Mr. Iain Douglas
Planning Section
Mayo County Council
Áras an Chontae
Castlebar
Co. Mayo

Dear Iain,

I am writing on behalf of Ms, Mary Corduff, Rossport South, Ballina who contacted me in relation to the new planning application by Shell Ireland at Bellagelly South, Co. Mayo (P.03/3343)

Mary is anxious to get a copy of the EIS report. Where can she get it? Mary wants to examine and read this report, as it her entitlement.

You might let me know, as a matter of urgency, where Mary can get a copy of the EIS report for this planning application. I look forward to hearing from you and thank you for your assistance.

With kind regards,

Yours sincerely,

MICHAEL RING T.D., M.C.C.
Fine Gael Spokesperson on Social & Family Affairs

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RECEIVED

MRS CORDUFF COLLECTED A COPY OF THE EIS YESTERDAY 22ND DEC. 2003

Ian Douglas SP
23/12/03

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Ceathrú Thaidhg,
Béal an Átha,
Co. Mhaigh Eo.
15/01/'04

Ian Douglas,
Senior Planner,
Mayo Co. Co.

Iain, a chara,
Thank you for response dated Jan, 9th to my complaint of Jan. 5th.. In case my complaint as such was misunderstood, may I make it clear that I did not think at any time that you were trying to obstruct the normal business of facilitating the planning process by making all relevant info. as easily accessible as possible.
As a further illustration of what I knew to be the case, a friend of mine inquired on the phone on the day following my daughter being refused if he could get a copy of the C.Ds and was immediately facilitated, as has another friend of mine since.

I am very aware that it is no picnic to be, in the front office, the interface between the public and the planning system: it can have aspects of riot control without the necessary tools, or being interrogated in the witness stand by a senior criminal barrister. However, my annoyance stemmed from the fact that petty niggling obstacles encountered by some relevant parties to the first and second stages of the Corrib planning applications generated an antagonism to the planning process and, in some cases, to the planners that soured the process unnecessarily, and made no contribution to the strengthening of the process or to the removal of inconsistencies and unwarranted interferences, a process that would benefit us all in our quest for a reasonable development and protection of the living environment of ourselves and our successors in sequent occupance hereof.

Le dea,mhéin,

Micheál Ó Seighin.

MAYO COUNTY COUNCIL
21 JAN 2004

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Phone: 097 81225

Chapel Street,
Belmullet,
Co. Mayo,

19th December, 2003.

Mr Ian Douglas
Planning Officer,
Mayo County Council.

Dear Mr. Douglas,

Re: **Application No. P03\3343**

I wish to register my concern that I have been unable to obtain exact information from your office in respect to obtaining a copy of the EIS relating to the above application.

On Wednesday, 17th December, a member of your staff informed my wife that 'hard copies' would be on sale at the Castlebar office at Euro 30 each but could not say when they would be available.

On Thursday, she was informed that the Application had not yet been validated and so no information was known as to its availability or cost - nor even when the validation process might be completed.

Today, Friday, 19th December, we learn from your office that validation has taken place and that "it is recorded as having been received and validated on 17th December", but that the cost will be Euro 100 for 'hard copy' of the EIS and Euro 20 for CD Rom. There is still no information as to its availability for purchase. And there is no information whatsoever available as to when it will be on the website.

Since time for lodgement of possible objections/observations is strictly regulated by law, and since the EIS is necessarily a voluminous document, the above record of service shows little concern for the public's right of access to this essential information. These needs were entirely foreseeable and should have been provided for and I submit that the 'clock' should not commence running re deadlines for lodging objections/observations until such availability issues are determined.

Yours sincerely,

Edward Moran.

ANSWERED BY PHONE 24/12/03.
Copy of CD - to save them another. Will pay at Belmullet office.
17. 24/12/03

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Moran Joe

From: Condon John
Sent: 19 December 2003 15:25
To: Moran Joe
Subject: FW: attention planning office P03/3343

-----Original Message-----
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Sent: 19 December 2003 15:15
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It is in this particular context that I request you to supply me with the information from your Road Section/Department, including the traffic/transportation plan as mentioned in the EIS and discussed and agreed my Mayo County Council and the Gardai.
I wish to caution Mayo County Council not to pre-empty any decision of planning application P03/3343 by carrying out road works on the stated routes prior to approval of the application, as this is part of the application.
Yours sincerely,
Monica Muller

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----- Original Message -----
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To: secretar@mayococo.ie
Sent: Friday, December 19, 2003 1:42 PM
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As the public have a legal time limit on making submissions to the above application for which I require the requested information, please treat this request as a matter of urgency.
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MONICA MULLER
ROSSPORT
BALLINA
CO. MAYO

19/12/2003

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Planning Notification Report

By Planning Application

Mayo County Council

Friday, Dec 19 2003

Planning Reference	DataSet	Details	Statutory Body	Buffer Distance (m)
033343	Planner	Planners=Alan Di Lucia, Claire Barwick, Cora Gilligan.		1
	Service Area	Service_Area=Western Region Director_of_Service=Peter Hynes		1
	Electoral Area	Electoral_Area=Belmullet		1
	Engineer	Engineer=Stephen Verity	Engineer	1
	Townland	Townland=Bellagelly South(Glenamoy Bridge/Milltown)	Planner	1
	SACs	AREA=36304100 PERIMETER=73273.03 SACMA_=98 SACMA_ID=97 PTYPE=1 SITECODE=000476 PR=1 VER=1.01	Duchas Letterfrack Galway	1000
	NHAs	AREA=36325896 PERIMETER=73259.59 MA_NHA_=123 MA_NHA_ID=730 PTYPE=1 SITECODE=000476 STATUS=1 AREA=2372849.2 PERIMETER=9036.53 MA_NHA_=113 MA_NHA_ID=318 PTYPE=1 SITECODE=001548 STATUS=1	Duchas Letterfrack Galway	1000
	Proposed Gas Pipeline	Name=Broadhaven to galway	Bord Gais Eireann Cork	100

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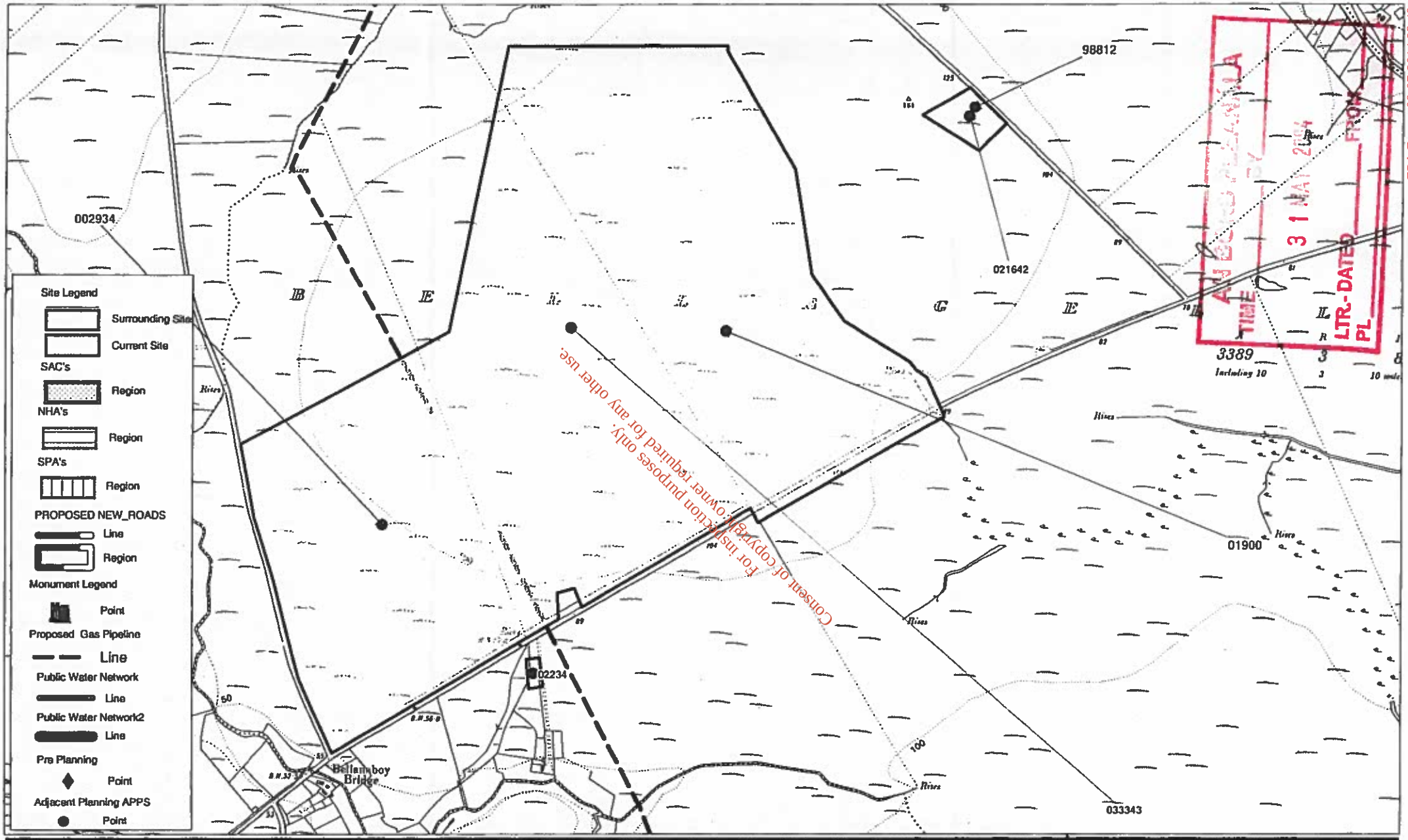
EPA Export 08-07-2014:23:49:49

Notification Report

Planning Reference	DataSet	Details	Statutory Body	Buffer Distance (m)
033343 Contd..... .. Contd..... ..	Regional Roads	SegmentID=R-314-125 SegmentID=R-314-123	Road Design Aras	100
	Adjacent Planning Applications	Plan_id=002934 Plan_id=01900	Planner	50

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Mayo County Council
G.I.S Section

Aras An Chontae
The Mall, Castlebar,
Co. Mayo, Ireland
Tel: 094 24444
Fax: 094 20390

G.I.S. Site Location Map : P03/3343

Map compiled for: Planning Section.

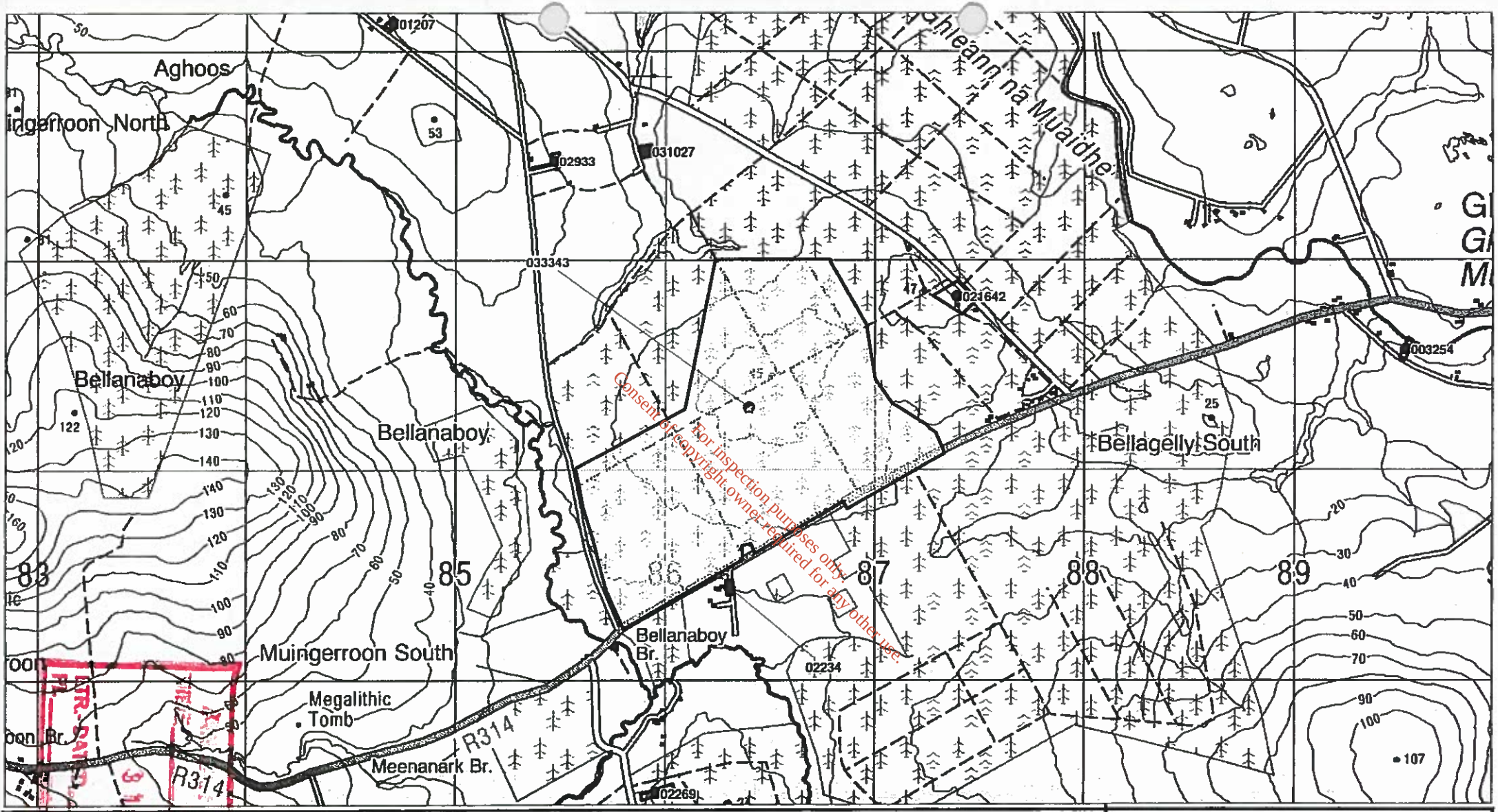
Map compiled by: D.Reddington, G.I.S Section.

Approved by: L.Walsh, G.I.S Project Co-ordinator.

Scale: 1:12,500

Date: 19/12/03

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Mayo County Council
G.I.S Section
Aras An Chontae
The Mall, Castlebar,
Co. Mayo, Ireland
Tel: 094 24444
Fax: 094 20390

Site Location Map P:03/3343

Map compiled for: Planning Section

Map compiled by: D.Reddington, G.I.S Section.

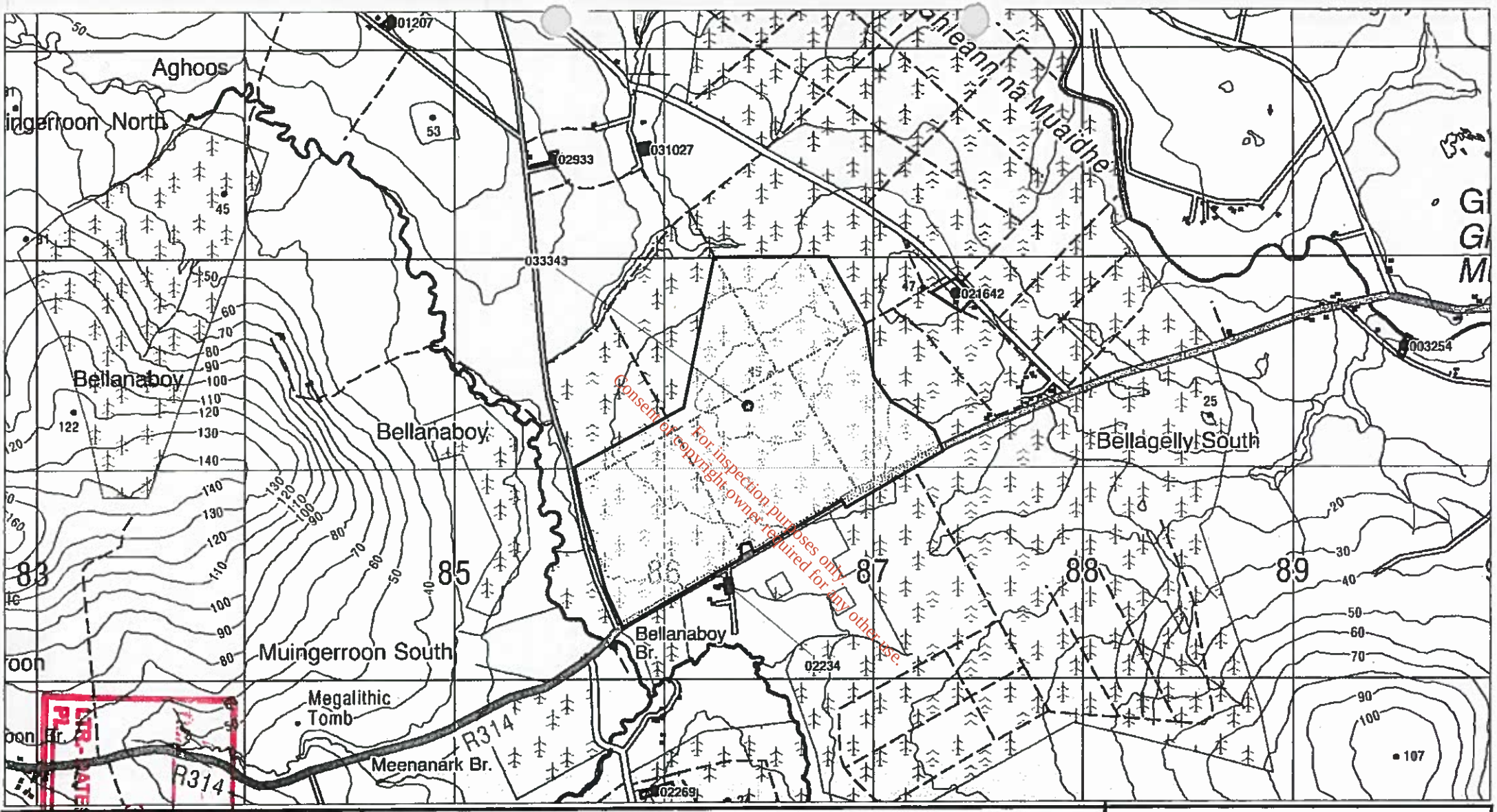
Approved by: L.Walsh, G.I.S Project Co-ordinator.

Scale: nts

Date: 19/12/03

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FROM
2004
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Mayo County Council
G.I.S Section
Aras An Chontae
The Mall, Castlebar,
Co. Mayo, Ireland
Tel: 094 24444
Fax: 094 20390

Site Location Map P:03/3343

Map compiled for: Planning Section

Map compiled by: D.Reddington, G.I.S Section.

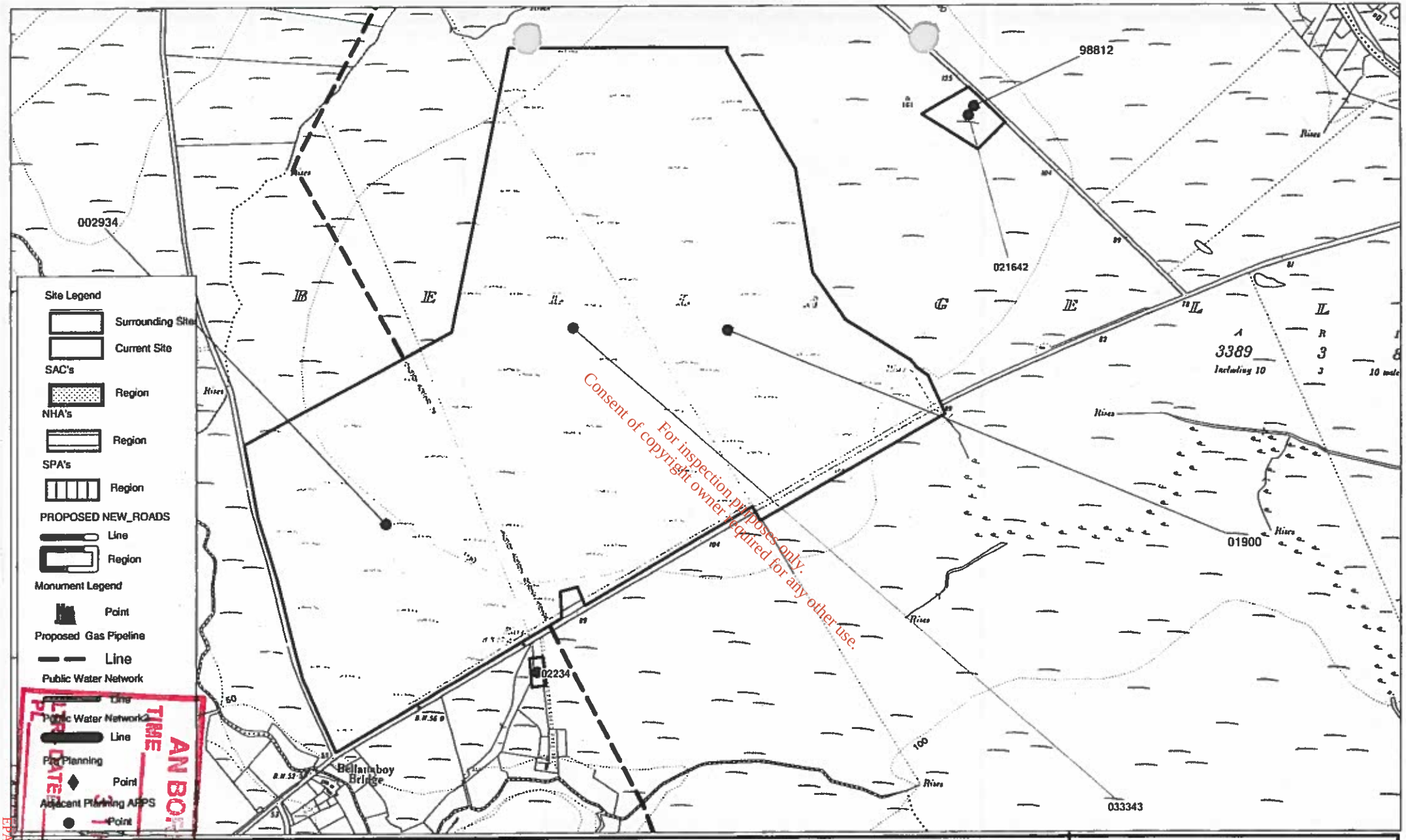
Approved by: L.Walsh, G.I.S Project Co-ordinator.

Scale: nts

Date: 19/12/03

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AN BORD PLEANÁLA
TIME DATE FROM
MAY 2004

Mayo County Council
G.I.S Section
Aras An Chontae
The Mall, Castlebar,
Co. Mayo, Ireland
Tel: 094 24444
Fax: 094 20390

G.I.S. Site Location Map : P03/3343

Map compiled for: Planning Section.

Map compiled by: D.Reddington, G.I.S Section.

Approved by: L.Walsh, G.I.S Project Co-ordinator.

Scale: 1:12,500

Date: 19/12/03

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Copy

148 Stillorgan Road,
Dublin 4
8 December, 2003

Mr. Mark Carrigy,
Mayo Area Manager,
Shell Exploration & Production

Dear Mr Carrigy,

Thank you for your letters about the Corrib project. I regret I am unable to travel to Geesala to view the exhibition in Teach Iorrais.

As one who has been associated with national development policy, I would wish to see our natural resources of oil efficiently developed. As a summer resident in Glencullen Lower (the former Glencullen National School), I would want to see this done without detriment to this beautiful locality and its people.

On two points,in particular, I would need to be re-assured:

1. I fear that the enormous tonnage of turf to be excavated at Ballinaboys and dumped at Shramore will be inherently unstable, liable (in a district of heavy rain, not infrequent cloudbursts, and landslides) to sliding and silting, with disastrous implications for the Muinhin River, which is the conduit for salmon and sea trout from the Owenmore to Carrowmore Lake. The Lake's attraction for anglers is of significant economic importance to the Bangor area.

2. The continuous transfer by 35 lorries of heavy loads of peat past my house for up to half a year after the winter period will not only be a terrible nuisance but could threaten the walls and foundations of this old school building (dating from 1887).The lay-by opposite my gate is an amenity I have made for myself and I would want to have sole access to it.

Yours sincerely,

Kenneth Whitaker

T.K.Whitaker

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MAYO GAS PROJECT

I wrote to Shell Exploration and Production on 8 December,2003 (copy attached) and, by invitation, I called to Corrib House to see the Managing Director, Mr. Andy Pyle, and the Mayo Area manager, Mr. Mark Carrigy, on 17 December.

I restated briefly the points I had made in my letter. On the first, the danger of a peat slide and serious damage to salmon, I was assured that there would be virtually no risk of sliding or silting. I argued that the slightest risk should be provided against in the unpredictable weather conditions of Erris, where there has been recent experience of unexpected cloudbursts and landslides. Mr Pyle agreed that special precautions should be taken and will consider my suggestion that, as well as not raising the infill to the surface of the surrounding bog, a suitable rampart should be built to protect against movement of infill towards either river.

On my second point, I was told that road precautions are to be taken in consultation with the County Council. I suggested lay-byes at reasonable intervals. I was assured that Shell would accept responsibility for any damage to walls or structures and would respect my private lay-bye.

T.K.Whitaker

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