

Additional Hearings 24 and 25 January 2019

Matter: Unconventional Oil and Gas

Question 9

500m Buffer Zone

9. Could the zonal issue be overcome by inserting a need for pre-permission testing? For example, might it be helpful to consider trial runs or field tests prior to planning permission being granted?

If one assumes the stages of the process to be conducted in the order of exploration, appraisal and production, prior to the undertaking of any '*mini fracks*' there would be the construction of the well pad (which would be no different to the principal fracking event) and the drilling of the well itself (which again would be no different from that which would be required in the case of carrying out a full hydraulic fracture of the formation).

As for '*trial runs*' or '*field tests*', in the context of this specific question these have been assumed to mean what has within earlier *Hearing Sessions* in 2018 been referred to as, the carrying out of the '*mini fracks*' referred to above. It is the understanding of the Authorities that even to undertake '*mini fracks*', similar, if not entirely the same, plant, equipment and machinery would be necessary to carry these out, as explained above.

Therefore, it is considered by the Authorities that it would be wholly inappropriate to be dealt with under a process of '*pre-permission*' testing.

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