

5<sup>th</sup> June 2012

Dear Mr Chamberlain Chief Executive, Mr McLay Director of Resource Management, Mr Bedford Director of Environmental Quality, Mr McLeod Chairman, and Councillors of Taranaki Regional Council

**We are submitting responses to items on the agenda of the Consents and Regulatory Committee of the Taranaki Regional Council (TRC) on Tuesday 5<sup>th</sup> June 2012.**

<http://www.trc.govt.nz/assets/Uploads/cr0506-pw.pdf>

**We wish to lay a serious pollution complaint regarding flaring at New Zealand Energy Corporation Copper- Moki.**

### **Item 2: Resource Consents and exercise of delegations (Page 7)**

We have raised serious safety, health and environmental concerns about continuous flaring at wellsites near our home and in our local community, specifically at TAG Oil Cheal A, Bridge Petroleum Limited Radnor-B, and New Zealand Energy Corporation (Taranaki Ventures Ltd) Copper- Moki in communication early in May to Taranaki Regional Council (TRC). We were extremely alarmed when we read the non-notified consent issued by TRC for a change of consent on 23<sup>rd</sup> May for Bridge Petroleum Limited to allow discharge of emissions to air from flaring, of hydrocarbons and miscellaneous emissions for an accumulated duration of 180 days per well, for up to 6 wells. **This allows for 6 months of continuous flaring per well, 3 years of flaring in total near farmhouses, the small community of Midhurst and SH3. This is very upsetting.**

### **Item 4: Investigation of air quality and flaring of fracturing fluids (Page 31)**

Taranaki Regional Council has written a report on the nature of emissions arising from the flaring and evaporation of fracking fluids and the effects on the air quality in the vicinity of wellsites. Mr McLay referred to this report (11<sup>th</sup> May email) in responding to our serious flaring concerns. The report describes a single simulation of flaring fracturing fluids. Samples of emissions from flares and evaporation were taken between 1pm and 5 pm on 7<sup>th</sup> February and 10am and 2pm on 8<sup>th</sup> February respectively.

<http://www.trc.govt.nz/assets/Publications/guidelines-procedures-and-publications/hydraulic-fracturing/Flaring2012-report.pdf>

The Executive Summary clearly states “it should be noted that all results relate to a field study carried out under specific source, topographic, and meteorological conditions. Therefore they cannot and must not be applied universally”. However the recommendations (page 44) draw the conclusion “that there are minimal effects upon ambient air quality in the vicinity of flares being employed for the destruction of emissions from hydraulic fracturing fluids, in the context of prevailing air quality within the region and nationwide. “

The recommendations continue this report can be referenced for “contingency flaring”; any review of the *Regional Air Quality Plan for Taranaki* (2011); and oil and gas companies to support their applications for air discharge permits. **These recommendations are very disturbing. It would be similar to completing a single test at a dairy farm in Taranaki (or New Zealand), stating it was alright, and drawing the conclusion all dairy farms were similar.**

## **Appendices**

**There is very worrying information within the appendices of this report.**

<http://www.trc.govt.nz/assets/Publications/guidelines-procedures-and-publications/hydraulic-fracturing/Flaring2012-appendices.pdf>

## **Appendix 1**

Rule 9 and 10 of the Regional Air Quality Plan for Taranaki 2011 outlining flaring at hydrocarbon exploration wellsites.

Rule 9 limits the time of flaring.

Rule 10 is used if Rule 9 cannot be used.

Rule 10 has been designed to acknowledge the issues that are currently being faced and are “becoming constrained by the emergence of new and often incompatible land uses in the neighbourhood, especially at

the time of consent renewal or consent replacement” particularly when flaring cannot be kept to the time zones.

**If the activity cannot comply with the conditions of Rule 9 or 10, Rule 55 applies.**

**Rule 55 states “discharges to air that cannot comply with rules 1 to 54” and has no standards, terms or conditions.**

<http://www.trc.govt.nz/assets/Publications/regional-air-quality-plan/air-plan-index/raqp-rules55.pdf>

### **Appendix 3**

‘Hydraulic fracturing liquid air discharge monitoring report’ February 2012 was completed by Source Testing New Zealand Ltd, Lower Hutt for Taranaki Regional Council (TRC) on which TRC’s report on air quality (May 2012) was based.

**Pg.7** “The simulation involved holding recovered hydraulic fracturing liquid in a tank and allowing the liquid to flow under gravity to the flare pit where samples were collected. The time frame allowed for the project was limited to 36 hours due to time constraints caused by the operation of the well site.”

**Pg.10** “The lack of any form of flue or stack from the gas flare made applying standard source testing methods difficult. Isokinetic sampling conditions normally required by stationary source test methods could not be replicated under such conditions. Furthermore, in order to safely access the flare, sampling equipment and personnel need to stay approximately 10 m away from the flare, behind the earth bund. In addition, the wide range of contaminants under investigation and the limited amount of time allowed, required the use of multiple individual sampling systems or sampling trains. This made for a very unique situation for the collection of air emissions samples.”

**Pg.21** “The wind changed during the day so some of the samples could not be collected.”

### **Appendix 4**

#### **Memorandum**

**To** Director of Environmental Quality, Gary Bedford

**From** Scientific Officer – Air Quality, Brian Cheyne

**Document** 1023534 (PDF Document 1040675)

**Date** 25 March 2012

**Ambient air quality survey during flaring of hydro-carbon residuals within the well hydro-fracturing wastes**

“Exploration companies and the Council considered it desirable to obtain reference emission and ambient data from a simulated flare, in order to base environmental assessments of flaring practice upon actual data. A flaring simulation was therefore conducted on 7-8 February 2012, with the **active assistance** of the

exploration company concerned. The event was monitored both for emissions (reported separately) and for downwind (ambient) air quality (reported herein).”

**completely contradicts the Executive Summary of the Taranaki Regional Council report on air quality (May 2012) approved by Mr Bedford, Director- Environment Quality and Mr Chamberlain, Chief Executive which states ...**

“The Council therefore undertook a study...while the region’s exploration and production companies endorsed the project, it should be noted the design and implementation were completely independent of any influence or direction from the companies””.

### **Copper-Moki- Significant air pollution**

We wish to lay a complaint about serious air pollution being caused by the continuous dark smoke being emitted while flaring at New Zealand Energy Corporation (Taranaki Ventures Ltd) Copper-Moki site. They have been continuously flaring for months.

This is the same wellsite where recently there was a breach of consent with crude oil finding a pathway from the flare pit to the Ngaere Stream. This was reported by the energy sector themselves.

<http://oilandgas.co.nz/News/NZEC-Spill-Suspends-Production/>

We have passed the site on a number of occasions and it is often billowing dark smoke.

Considering a report on air quality from hydrocarbon industries is being placed in front of Taranaki Regional Council today and they have been concerned about residents burning rubbish in their backyard it would seem important to investigate this matter immediately.

We have included evidence of our concern.



The attached photos were taken on 3<sup>rd</sup> June 2012.

We would appreciate action.

Yours faithfully

Sarah Roberts and David Morrison

Concerned citizens and affected residents of Taranaki