

The Secretary,
An Bord Pleanála,
64-67 Marlborough Street,
Dublin 1.

31st May 2010

RE: ONSHORE UPSTREAM GAS PIPELINE FACILITY RELATING TO THE CORRIB GAS FIELD PROJECT, COUNTY MAYO, CO. MAYO.

AN BORD PLEANÁLA REF: 16.GA0004

FORMAL RESPONSE TO AN BORD PLEANÁLA LETTER DATED 2nd NOVEMBER 2009.

Dear Sir,

On behalf of Shell E & P Ireland Limited (SEPIL), Corrib House, 52 Leeson Street Lower, Dublin 2, Tel. (01) 6694100, email info@corribgas.com, acting on behalf of SEPIL, Statoil Exploration (Ireland) Limited and Vermilion Energy Ireland Limited (the Corrib Gas Partners), RPS Group, West Pier Business Campus, Dun Laoghaire, County Dublin, formally submits this response to the An Bord Pleanála request for information dated 2nd November 2009.

Enclosures

The following items are enclosed as the formal response to An Bord Pleanála to its letter of 2nd November 2009: -

1. This cover letter
2. A revised Environmental Impact Statement in respect of the proposed development of the Corrib Onshore Gas Pipeline (Volumes 1 and 2), including a separate EIS in respect of the use of the Srahnmore Peat Deposition facility (Volume 3)
3. Book of Further Information drawings

Ten no. sets of the application plans and particulars, (5 no. hard copy, and 5 no. electronic copy) are being submitted.

Introduction

The Corrib Natural Gas Field was discovered by Enterprise Oil in 1996 off the coast of County Mayo. Its development represents the largest natural gas development in Ireland for over 30 years. The field is classified as a small to medium sized offshore gas field, estimated to contain approximately 1 trillion cubic feet (tcf) of gas. It is currently predicted that the Corrib Gas Field will supply up to 60% of Ireland's gas needs during peak supply and will have a field life of between 15 and 20 years.

The Corrib Gas Project is divided into five inter-related and inter-dependent elements as follows:

- *Offshore seabed installation (subsea wellheads and manifold at the Gas Field); (constructed)*
- *Offshore gas pipeline (between wellheads and landfall); (constructed, but for umbilical)*
- *Onshore gas pipeline (between landfall and gas terminal); (consented in 2002; amended scheme currently before An Bord Pleanála)*
- *Bellanaboy Bridge Gas Terminal; (under construction – substantially complete) and,*
- *Onshore 150km Mayo to Galway downstream pipeline; (constructed)*

The Corrib Gas Partners are committed to completing the Corrib development as a whole.

The entire Corrib Gas Project, incorporating the five above listed elements, had received all regulatory consents as of 2004. Notwithstanding this, the Corrib Gas Partners took the decision to willingly amend the previously consented onshore portion of the pipeline development to accommodate community concerns. SEPIL applied for all necessary consents for a modified route for the onshore pipeline in February 2009 and following an Oral Hearing in 2009, An Bord Pleanála in a letter dated 2nd November, 2009 requested that further alterations be made to the proposed development including a modified route alignment. The current proposed scheme relates to the onshore pipeline element of the overall Gas Project.

Overview of Issues Contained in the An Bord Pleanála letter of 2nd November 2009

The correspondence from An Bord Pleanála includes the following main elements:

- *An affirmation from An Bord Pleanála as to the strategic national importance of the Corrib Gas Project, and recognition of the current status of the overall Gas Project.*
- *A provisional view from The Board that should certain alterations be made to the proposed development, it would be appropriate to approve the proposed onshore pipeline development;*
- *A number of expressed concerns as to the nature and routing of the proposed scheme originally lodged under Reg. Ref: 16.GA0004; and*
- *A listing of the said alterations and related assessment, directly sought by An Bord Pleanála, including a revised EIS and incorporating an Appropriate Assessment of the impact of the development on Natura 2000 sites.*

There are also a number of procedural comments from The Board.

Response to An Bord Pleanála letter of 2nd November 2009

SEPIL maintains the view that the original proposed development under Ref 16.GA0004 is safe and meets all applicable criteria. This was confirmed by the submission of the Technical

Advisory Group for the Department of Communications Energy and Natural Resources at the 2009 Oral Hearing. Nonetheless, SEPIL has considered the commentary of An Bord Pleanála as set out in its letter of 2nd November 2009, and is responding positively with a series of alterations to the scheme, in order to address the issues raised. These are summarised below, and are covered in great detail in the revised EIS and associated revised application, particulars of which accompany this letter.

Specific Alterations

Having regard to its expressed views, and to provide a considered resolution to the issues raised, An Bord Pleanála has invited that the pipeline route be modified between chainages 83+910 and 89+550, *'so that the route at this location would be generally in accordance with that indicated as Corridor C (that is within Sruwaddacon Bay) in the route selection process which formed part of the Environmental Impact Statement (EIS) and planning application.'*

The modification generally as described below, is now formally proposed in this response by SEPIL. The revised EIS sets out clearly and comprehensively, the revised proposed development, including its construction methodology, and the likely significant impacts arising from this amended development.

The full nature and extent of the modified scheme, including all direct and consequential changes proposed to reflect the invitation of the Board, is set out at Chapter 4 of Volume 1 of the revised EIS. Full detail of the alterations to the extent of the site is also provided within the revised EIS and the book of Further Information drawings. In summary the amended scheme includes:

- *Onshore gas pipeline which will transport gas to the Gas Terminal;*
- *Services umbilicals which are used to prevent the formation of methane hydrates and control the subsea wells;*
- *Umbilical cores which carry treated produced water from the Gas terminal for discharge at the subsea manifold at the Corrib Gas Field;*
- *Outfall pipeline which carries treated surface water from the Gas Terminal; and*
- *Landfall Valve Installation (LVI) (located approximately 50m from the cliff edge at Gleann an Ghad (Glengad)). The purpose of the LVI is to limit the Maximum Allowable Operating Pressure (MAOP) in the onshore pipeline to 100 barg.*

The proposed onshore pipeline is approximately 8.3km long. The pipeline will be fabricated from high-grade steel, will have a diameter of 508mm (20 inch) and will have a nominal wall thickness of 27.1mm (>1"). The normal operating pressure for the Corrib Onshore Pipeline at the Terminal inlet will be approximately 85barg (equivalent to approximately 90 barg at the LVI).

Approximately 4.9km of the pipeline between Gleann an Ghad (Glengad) and na hEachú (Aghoos) (approximately 4.6km of which will be laid underneath Sruwaddacon Bay) will be constructed within a tunnel. The tunnel will be 4.2m in external diameter (3.5 metres internal diameter) and will be constructed using a tunnel boring machine launched from na hEachú (Aghoos) with a reception pit at Gleann an Ghad (Glengad). The tunnel will be installed with a minimum depth of cover of 1.3 times the tunnel external diameter, in accordance with accepted codes for tunnel construction. The tunnel will be lined with precast concrete segments. The services umbilical and the outfall pipeline will also be placed in the tunnel. The tunnel will be backfilled with cement grout.

The remaining 3.4km of gas pipeline, together with services and outfall pipeline, will be laid underground with a minimum depth of cover of 1.2m. Temporary working areas, site compounds and haul roads will be required to facilitate construction.

We confirm that an ecological assessment (known as a *Natura Impact Statement* (NIS) and used to support the Appropriate Assessment process) of the impact of the proposed development has been undertaken by ecological specialists and is provided with this formal response, at Appendix P of the revised EIS. In the context of an appropriate assessment under Article 6.3 EU Habitats Directive (92/43 EEC) it is the view of the authors of the NIS that the proposed development will have no adverse impact on the integrity of the Natura 2000 Sites Glenamoy Bog Complex candidate Special Area of Conservation or Blacksod Bay Broadhaven proposed Special Protection Area or on any other designated site.

This revised proposal does not include any substantive change to the Srahmore element of the overall development; Volume 3 of the revised EIS has been updated to include additional baseline information gathered since the 2009 EIS and has otherwise been revised to reflect the proposed changes to the pipeline route and the construction scheduling relating to same (as detailed in Volumes 1 and 2 of the revised EIS).

Consequences of Specific Alterations

The key alterations to the proposed development have resulted in:

- *A further significant increase in distance from the pipeline to the nearest occupied residence, the closest occupied residence is now over 230 metres from the pipeline;*
- *A development with no likely significant impact on sensitive ecological areas, through the placing of a significant proportion of the pipeline in a concrete tunnel from Glengad to Aghoos through Sruwaddacon Bay,*
- *An even lower probability (than the previously already low probability) of surface intervention in the bay, through the use of a construction methodology which uses a larger tunnel boring machine;*
- *The reduction in traffic impacts, on the road network and rural residential areas of Rosspoint, Glengad and Pollathomas as a result of the revised pipeline routing and by focusing the tunnelling-related construction activities in Aghoos;*

- A Maximum Allowable Operating Pressure (MAOP) in the Offshore Pipeline of 150 barg upstream of, and including, the Landfall Valve Installation (LVI) at Glengad.
- An MAOP in the Onshore Pipeline between the LVI and the Bellanaboy Bridge Gas Terminal of 100 barg;
- The proposed pipeline is now shorter than that previously proposed; and the chainages of the onshore pipeline have changed as a result of the route modification.
- The proposed pipeline is no longer located within Priority Habitat in the Glenamoy Bog Complex;
- Tunnelling activity in Glengad is now reduced as compared to the previous proposal, with the main tunnelling compound being located at Aghoos and only a reception pit for the tunnel boring machine now proposed at Glengad
- The application boundary has changed; full details are set out in the revised EIS and Book of Further Information drawings.

These alterations will continue to ensure that the scheme will meet all appropriate regulatory requirements in terms of risk management. In fact it should be noted that the alterations will provide for a level of safety considerably beyond the risk threshold expressed by An Bord Pleanála as 'broadly acceptable'.

Specific Concerns Addressed

The proposed alterations described above specifically address the issues raised by An Bord Pleanála as set out under item Nos. 1 to 3 of page 1 of the letter of 2nd November 2009, as follows:-

Item (1)

The detail now submitted as part of this formal response, provides a complete, transparent demonstration that the pipeline does not pose an unacceptable risk to the public. This includes the preparation of an updated Appendix Q within the revised EIS. Appendix Q confirms:-

- The level of risk for an individual of receiving a dangerous dose or more, at the nearest house, is predicted at almost one hundred thousand times less than An Bord Pleanála's expressed upper level of 'broadly acceptable' risk,
- The level of risk for an individual of receiving a dangerous dose or more whilst standing at the pipeline, is below the level of individual risk expressed by An Bord Pleanála, as 'broadly acceptable' and also below the level of risk defined by An Bord Pleanála for the outer boundary of the outer zone,
- The societal risk at Glengad is almost one million times less than the expressed criterion for 'broadly acceptable' and is even less so elsewhere along the route.

Regardless of the actual extremely low likelihood of the occurrence of such a scenario, as described above, Appendix Q also addresses directly the matter of consequence and

concludes that, for the worst conceivable full-bore rupture scenario at maximum pressure, and assuming immediate ignition, then;

- *A person standing beside the nearest dwelling would be able to reach the shelter of that dwelling without receiving a dangerous dose of radiated heat,*
- *All existing normally occupied dwellings provide safe shelter, in that none would spontaneously catch fire or catch fire at a later stage.*

In considering the matters of likelihood and consequence, addressed above and in Appendix Q of the revised EIS, it is imperative to note the recent safety legislation - *the Petroleum (Exploration and Extraction) Safety Act 2010* which was passed by the Oireachtas, since the issuing of The Board's letter of 2nd November 2009. This legislation provides for the establishment and implementation of a 'risk-based' petroleum safety framework.

The *Petroleum (Exploration and Extraction) Safety Act 2010* will transfer statutory responsibility for the regulation of safety for upstream petroleum infrastructure such as the Corrib pipeline from the Minister for Communications Energy and Natural Resources to the Commission for Energy Regulation. This legislation provides for ongoing safety regulation and certification of designated upstream petroleum activities through a safety case regime, similar to that in place for the downstream gas industry in Ireland, including the Irish gas transmission network as well as gas storage and LNG facilities.

Notwithstanding this and in any case, Appendix Q of the revised EIS demonstrates that the requirement of An Bord Pleanála's in respect of *'the appropriate hazard distance for the pipeline in the event of a pipeline failure'* is met in full.

Item (2)

As noted under Item 1 above, the amended pipeline route also addresses the Board's issues relating to the proximity distance of the pipeline to dwellings.

The amended pipeline route no longer traverses the rural settlement of Rosspoint; thereby addressing the Board's expressed concerns relating to traffic, residential amenity and development potential of lands. Moreover, the revised scheme route, including the placing of a significant component of the overall onshore pipeline, in a tunnel within Sruwaddacon Bay, means that the potential for impacts on the local community, of the form described at Item 2 of The Board's letter, are even further reduced.

Item (3)

Item (3) of The Board's correspondence states, *'that part of the route of the pipeline which is onshore (between chainage 83+390 and 83+400) has been omitted from the application i.e. between chainage 83+400 and the high water mark (HWM)'.*

SEPIL contends that this short stretch of pipeline was fully permitted under the consent granted in 2002 Section 40 of the Gas Act, and we confirm that it has already been constructed in accordance with that separate consent. Allied to this, it is SEPIL's contention that such

construction was exempted development within the meaning of the Planning and Development Acts. Without prejudice to these contentions, in deference to the Board's request that it be included in the application, we now attach drawing details that clearly identify this length of pipeline. Drawing details are now included in the formal response.

Items of Further Information Requested by An Bord Pleanála

An Bord Pleanála noted in its November 2nd 2009 letter that *"the site of the proposed development has been incorrectly detailed in the EIS between chainage 91.537 and chainage 92.539, i.e. the existing stone road at the Terminal end of the pipeline."* The Board has invited SEPIL to amend the details of the proposed development at this location. We can confirm that such amendment is now incorporated in the revised EIS and associated further information package, (Appendix M3 of the revised EIS refers).

An Bord Pleanála has also requested fourteen specific items of further information. A full listing of these is set out below, along with a referencing of where the information is provided within the overall package, including a revised EIS, now submitted to The Board.

Item No.	An Bord Pleanála Request for Further Information items (2/11/09)	EIS section
Top of page 2	...the Board should, therefore, (a) adopt the UK HSE risk thresholds for assessment of the individual risk level associated with the Corrib Gas Pipeline, individual risk level above 1×10^{-5} – intolerable, individual risk level between 1×10^{-5} and 1×10^{-6} – tolerable if ALARP (As low as reasonably practicable) is demonstrated, individual risk level below 1×10^{-6} broadly acceptable, and	App Q6.4 (Section 8.3 and Fig. 13)
Top of page 2	(b) adopt a standard for the Corrib upstream untreated gas pipeline that the routing distance for proximity to a dwelling shall not be less than the appropriate hazard distance for the pipeline in the event of a pipeline failure. The appropriate hazard distance shall be calculated for the specific pipeline proposed such that a person at that distance from the pipeline would be safe in the event of a failure of the pipeline.	App Q6.5(i)
(a)	Clarify the code requirements and pressure test requirements for the pipeline from chainage 83+390 (HWM) approx. to chainage 83+470 (downstream weld at LVI)	App Q2.1 (Section 3 & Section 5.4)
(b)	Provide confirmation that the design of this section of the pipeline meets the requirements set down by the Technical Advisory Group (TAG).	App Q2.1 (Section 3)
(c)	Provide an integrated set of design documentation in the form of a revised Appendix Q.	App Q
(c)1	The documentation should integrate the analysis provided in the incidental and individual documents at the oral hearing.	App Q & App Q1 (Attachment Q1B, Table B1)
(c)2	The whole set should provide a transparency of the design for the complete pipeline from the HWM to the terminal. This transparency should relate to the different site and design conditions along the pipeline and should relate to the codes.	App Q2.1 & App Q3.2
(c)3	The design should include the analysis related to ground stability	App Q4.1 (including Attachment Q4.1A) & App M2
(c)4	and should provide a system for monitoring movement of the pipeline in those areas of deep peat.	App Q4.1, Chapter 15 & App M2

		(Section 8.5 & Drawing 001)
(c)5	Furthermore, the maximum allowable operating pressure (MAOP) for the pipeline should be stated.	App Q2.1 (Section 4.5) & App Q4.5 (Section 2)
(d)	Submit a new QRA that presents the analysis of risk at the different operating conditions and different locations along the pipeline route.	App Q6.4 (Table 9 & Section 8)
(d)1	The QRA should be site specific.	App Q6.4 (Table 9 & Section 8) & App M2
(d)2	The QRA should include ground movement and incorporate a database that matches the conditions of the proposed development.	Q6.4 (Section 6.4.5) & App M2/M3
(d)3	A sensitivity of the QRA is required which demonstrates the range of risk that relates to any uncertainty (in the database) of failure frequencies for the various potential failure modes of the pipeline.	App Q6.4 (Sections 7.4 & 8.7)
(d)4	The database should be relevant for an upstream wet gas.	App Q4.9 & Q6.4 (Sections 6.2 & 6.4.3.1)
(d)5	In order to eliminate any doubt please note that all failure modes should be included including the possibility of third party intentional damage at Glengad,	App Q4.10, App Q6.3 (Attachment Q6.3A, p. A5 and Attachment Q6.3B Fig. B4.5, p. B22) and Q6.4 (Section 6.4.7, Attachment B - Figs 18, 19 & Table 20)
(d)6	Wet gas in the pipeline,	App Q4.7-4.9, App Q6.3 (Attachment Q6.3B, Figs. B3.4-B3.9 & Figs. B5.4-B5.9) & App Q6.4 (Sections 6.4.3 and 6.7.1.2)
(d)7	CO ₂ in the pipeline and	App Q4.7-4.9, App Q6.3 (Attachment Q6.3B, Figs. B3.4-B3.9 & Figs. B5.4-B5.9) & App Q6.4 (Sections 6.4.3 and 6.7.1.2)
(d)8	potential for Methane Hydrate in the pipeline.	App Q4.5 (Section 6), App Q6.3 (Attachment Q6.3B, Fig. B3.13) & App Q6.4 (Section 6.3.2.3)
(e)	Provide a qualitative assessment of risk. This should be prepared for the different operating conditions and different locations along the pipeline route and should provide a comprehensive assessment to include those events that cannot be easily defined mathematically.	App Q6.3
(f)	Submit an analysis of the condition where the umbilical becomes severed and the control of valves at the wellhead and the subsea manifold is lost. The analysis needs to identify what conditions apply to the onshore pipeline and the risks involved in that circumstance.	App Q4.5 (Section 3.2) & App Q6.3 (Section 4.4 & Attachment Q6.3B, Figs. B6.1-B6.4)

(g)	An examination of the potential for pressure in the offshore pipeline to increase to wellhead pressure levels in the event that all wellhead valves had to be shut in over a prolonged period and in that period incremental leakage past the valves occurred.	App Q4.5 (Section 4)
(g)1	The concept of a vent at Glengad as a measure to protect against pressure at the wellhead side of the pipeline at the landfall rising above the maximum operating pressure should be examined.	App Q4.5 (Section 7)
(g)2	Information should also be provided on the reliability of the subsea shut down valve system proposed for the wellhead and manifold offshore.	App Q4.6
(h)	Provide details of the examination of the potential increase in safety for the population at Glengad by the use of a straight pipe at the landfall and	App Q4.4
(h)1	provide full justification for the proposed design as submitted (and any revised design that may result from the modifications requested herein).	App Q4.3
(i)	Provide details of the hazard distances, building burn distances and escape distances in contours for the entire pipeline.	App Q6.5(i) & (ii)
(i)1	The applicant should indicate the outer hazard line contour which should show the distance from the pipeline at which a person would be safe. A number of these contours were provided at the oral hearing, however, the set of hazard contours should be complete and should include the entire onshore pipeline as far as the terminal.	App Q6.5(i)
(i)2	Please indicate the assumption made in determining these hazard contours and indicate any limitations that apply to these hazard contours.	App Q6.5(i) & (ii)
(j)	Provide details separately of the inner zone, middle zone and outer zone contour lines for the pipeline. These shall represent the distance from the pipeline at which risk levels of 1×10^{-5} , 1×10^{-6} and 0.3×10^{-6} per kilometre of pipeline per year exist.	App Q6.4 (Section 8.6 and Fig. 15)
(k)	Provide an assessment of the societal risk for Glengad and the societal risk along the revised route. This should be fully documented.	App Q6.4 (Section 8.5)
(l)	Submit precise section by section details of the proposals for temporary peat turve storage, which take into account the condition of the existing surface layer of the peat and which specifically identify where peat turves or remoulded peat will be stored on bog mats adjacent to the stone road (or elsewhere).	App M2 (Section 5, Table 2 & Drawing 001)
(m)	Submit details of the specific risk mitigation measures that would be proposed for each of the sections within the peat lands (Sections 1 to 18 were the relevant sections in the route as originally proposed and as set out in the qualitative assessment of relative peat failure potential which was presented as additional information at the oral hearing). These details should identify in particular where there would be limits on the storage of peat on bog mats adjacent to the stone road excavation and where a conservative approach would be proposed to the use of design factors and in the assessment of peat stability.	App M2 (Section 5, Table 2 & Drawing 001)
(n)	Submit an assessment of the potential impact of the estimated stone road settlements on the umbilical pipeline and service ducts that will also be constructed within the stone road,	App M2 (Section 8) & App Q4.1 including Attachment Q4.1A
(n)1	including an assessment of the risks associated with failure due to rupture of these umbilicals or services.	App Q4.5 (Section 3), App Q6.3 (Section 4.4 & Figs. B6.1-B6.4) & App Q6.4 (Sections 6.3.2.7, 6.4.5 & 8.1)
Page 4, para 1	Revised drawings should be submitted which fully describe the full extent of the onshore pipeline from the HWM to the terminal site.	Book of drawings & App A
Page 4, para 2	The site of the proposed development has been incorrectly detailed in the EIS between chainage 91.537 and chainage 92.539, i.e., the existing	App M3 (Drawing DG0112R14)

stone road at the Terminal end of the pipeline. The applicant is invited to amend the details of the proposed development at this location.

Compulsory Acquisition Orders

An Bord Pleanála has advised that in the event of an acquisition order being required for any additional land or rights over land, an application for such order should be prepared under the provisions of the Gas Act 1976 (as amended) and submitted to The Board in conjunction with the information requested in its letter of 2nd November 2009. The Board also confirms that as an alternative, an application for an acquisition order to cover the entire revised route may be submitted. In this regard we confirm that a concurrent application has been submitted to An Bord Pleanála for a Compulsory Acquisition Order in order to construct, operate and maintain the proposed pipeline development. That application replaces application 16.DA0004, which is being simultaneously withdrawn as a result of the requirement for a revised application under Section 40 of the Gas Act, described below. As a result of the modification to the route, the land affected by the Compulsory Acquisition Order will be significantly reduced, with only one new landholding affected.

Other Applications

At the same time as application 16.GA0004 was submitted to The Board in February 2009, SEPIL applied separately for a new consent under the Gas Act for the entire pipeline, as there is no mechanism to amend the existing consent issued under that Act in 2002. We confirm, that as a consequence of the alterations to the proposed scheme now set out herein, a concurrent revised application for consent for the overall pipeline development is being made to the Minister for Communications, Energy and Natural Resources under Section 40 of the Gas Acts 1976 as amended. This will replace the current "Section 40" application made in February 2009.

A Foreshore Licence was issued in May 2002 under the Foreshore Acts to construct/install, operate and maintain the previously approved gas pipeline in the foreshore. However this licence was specific to the exact route of the approved pipeline. As a result a further revised application in respect of the proposed works in the foreshore with respect to the onshore gas pipeline will be submitted shortly to the Minister for Environment, Heritage and Local Government for a Foreshore Licence under the Foreshore Acts 1933-2009.

Public Notices

The Board's letter of 2nd November 2009 states that the '*alterations to the extent of the site the subject of this planning application shall be accompanied by revised public notices as referred to below*'. The letter then states that, '*please note that upon receipt and examination of any response to its request, The Board can at that stage invoke its powers pursuant to subsection (7) and (8) of Section 182C of the said Act which require the undertaker to publish a newspaper notice of the furnishing of the further information and to make same available for inspection or purchase... You will also be requested to erect site notices at specified locations along the route*'. In this regard SEPIL will provide revised public notices in the form as requested by The Board and at the stage so requested by The Board within the provisions of above mentioned subsections.

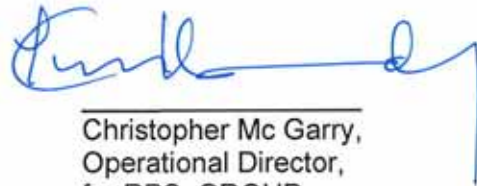
With specific regard to the future request to SEPIL from The Board, to erect site notices at specified locations along the route, we have anticipated this with a series of proposed locations for potential site notices. These locations are shown on Drawing DG0101, which forms part of the full response submission to The Board.

To conclude on this point, we note the comments of An Bord Pleanála with regard to its statutory powers under Section 182C (7) and (8) of the Act. We await any instructions from the Board.

Conclusion

The revised proposal for the route of the onshore pipeline positively responds to, and fully addresses, the issues raised in The Board's letter of 2nd November 2009. The information contained in the accompanying EIS, provides a complete, transparent demonstration that the proposed pipeline does not pose an unacceptable risk to the public. Moreover, the assessment demonstrates that the proposed development will not have any likely significant impacts on the environment and will otherwise be in accordance with the proper planning and sustainable development of the area.

Yours faithfully,

NP. 

Christopher Mc Garry,
Operational Director,
for RPS GROUP.