

Rebecca Brough
Dover District Council
Democratic Services
White Cliffs Business Park
Dover
Kent. CT16 3PJ

Dear Rebecca,

Ref: Methane levels in Dover District Groundwater

I am writing in response to Dover District Council's Scrutiny Committee request for Affinity Water views in respect of potential contamination of the aquifers from proposed Coal Bed Methane exploration planning applications submitted to Kent County Council.

Affinity Water Limited is the water undertaker appointed by Ofwat for the area affected by the potential exploratory drilling operations. As the water undertaker for the area, we have a duty under the Water Industry Act 1991 to ensure that the water we supply to our customers is wholesome and that in relation to each of our water sources there is, as far as reasonably practicable, no deterioration in the quality of water which is supplied from the source. We must therefore ensure that an assessment is made of the proposed activity within the catchments that present a risk of pollution to our public supply boreholes.

We have reviewed the documentation provided by Coastal Oil and Gas as part of their planning applications and the documentation does not currently contain sufficient information to provide assurance that appropriate steps have been taken to identify, assess and mitigate potential risks to groundwater. Consequently, we have raised an objection to these applications to Kent County Council.

I have summarised below our general concerns which were raised in the objection:

- Hydrogeological Risk Assessments have not been included in the applications so potential risks to groundwater are not identified at the planning stage of the process. We therefore cannot be certain that risks to groundwater have been adequately considered and mitigation measures identified.
- We are concerned that turbidity issues may arise at the nearby public water supply borehole sources while drilling through the chalk layers which may cause outages at one or more of our pumping stations. We have particular concerns during periods of high demand and request assurance on how this can be mitigated/avoided.
- There appears to be a lack of baseline monitoring for methane and other gases and also groundwater level monitoring at the existing boreholes in the vicinity that may be affected by the drilling activities prior to, during and after the installation of the exploratory borehole. We also have concerns that long term monitoring has not been defined once the exploration stage has ceased, especially should the exploratory boreholes become production sources.

There is uncertainty regarding the potential nature and impact of such activities on groundwater which we are seeking assurances that our concerns are addressed through the planning process. Affinity Water is working with the Environment Agency and the water industry to identify, assess and understand the mitigation measures required to protect groundwater.

We are prepared to discuss these concerns further with the Environment Agency, Kent County Council and the applicants (Coastal Oil and Gas) to ensure that protection of groundwater during drilling, exploration and long term monitoring is fully considered and any risks identified are mitigated.

Yours sincerely

Alister Leggatt
Catchment Officer
Affinity Water Ltd.