

**COUNCIL FOR NATURE CONSERVATION
AND THE COUNTRYSIDE**
An Advisory Council to the Department of the Environment

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14 May 2010

Mr Chris Coyle
Planning Service
Millennium House
17 – 25 Great Victoria Street
Belfast BT2 7BN

Via Email

Dear Mr Coyle

THE PROPOSED ISLANDMAGEE NATURAL GAS STORAGE FACILITY

CNCC welcomes the opportunity to comment on this proposed development. We have looked at this proposal with considerable interest, not just because of the use of underground chambers to store gas, but also the potential for carbon capture and storage.

We have some concerns about one aspect of the proposal, namely the discharge of very concentrated brine into the sea off Islandmagee. The EIA claims that this discharge, which is also 10°C above background sea temperature, will be diluted to background levels within 10m of the discharge point. Our concern centres on the stratification of this brine within the water column, with the salt concentration tending to force the plume to sink, while the temperature difference will encourage it to rise. The modelling seems to indicate that marine life will be affected only within a very small area, but we are concerned that with tidal movements there may be a significant dead zone created around the outfall. While this area is probably not exceptional in terms of flora and fauna it does hold a wide diversity of species and is currently relatively undisturbed. We are concerned with the attitude that if an area is not designated or does not hold priority species it is automatically expendable.

The discharge of brine is also of concern because of the unknown nature of its chemical composition. While it is claimed that suspended solids will be less than in sea water there is no indication of what these solids might be. The soluble fraction is similarly unknown, as acknowledged in Para 6.6.8. This could lead to a more severe impact from the discharge, both in respect of the damage caused to flora and fauna and the extent of that damage. We look forward to the results of the detailed chemical analysis of the samples of salt recovered from the initial test well, but are surprised that this testing has not already taken place.

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Finally, it is claimed that the discharge of brine will take place over four years, and will then cease. We are concerned that following substantial investment in the necessary infrastructure to process and dispose off the concentrated brine there will be pressure to continue to make use of it in the creation of further caverns to store more gas or for carbon capture and storage. The duration of brine discharges could therefore be considerably prolonged, and therefore potentially more severe.

Yours sincerely

A handwritten signature in black ink, appearing to read "Patrick Casement". The signature is written in a cursive style with a horizontal line underneath the name.

**PATRICK CASEMENT
CHAIRMAN**