

**To**

The Ministry of Environment, Waters and Forests of Romania  
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**From**

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**Dear representatives of the Ministry of Environment, Water and Forests,**

Bankwatch Romania Association, based in Bucharest, 69 Vasile Lascăr Street, submits the following comments on the environmental impact of the Corvinus Nyékpusztá Project initiated by Hungary and published for consultation on 17 December 2025. The comments are accompanied by a list of signatories who support the views expressed.

The project is located in the Békés region, near the town of Sarkad, approximately 10 kilometres from the nearest border with Romania. The project involves the extraction of hydrocarbons using unconventional technologies, such as hydraulic fracturing, at a depth of over 4,000 metres. The project is estimated to last 40 years, with a production of 1.5 million cubic metres per day.

We believe that this project poses potential environmental risks for Romania due to its size, the type of work planned and its proximity to the border, which is why we are requesting additional information and a cross-border environmental impact assessment.

We also note that the environmental impact assessment procedure was only launched in 2024, two years after the first drilling. Seven wells have already been drilled, and the total number of wells to be developed is unknown.

Although the environmental report does not identify a negative cross-border impact, crucial information that could help determine this impact is missing. We therefore ask you to request additional information from the Hungarian side on the following issues:

**Cumulative impact of the project:**

- There are no details about the size of the Sarkad I hydrocarbon deposit. It is estimated that 2-3 wells will be opened per year, but the total number and density of wells, as well as the estimated lifetime, are unknown. These data should be determined before the environmental permit is issued and production begins, as they are key information for assessing different types of impact.
- The cumulative impact with other activities in the area is not analysed. Chapter 5 does not fully analyse the initial state and does not refer to other activities with environmental impact apart from the existing wells. In fact, the initial state of the

environment could be altered by the drilling already carried out without an environmental impact analysis. These have only gone through the scoping stage.

- In certain environmental aspects, not even the cumulative impact of all activities within the project is analysed, for example in the case of pollutants.

## Seismicity and fracking fluid

- The effects of disposing the waste fracking fluid by injecting it into abandoned hydrocarbon wells are missing from the environmental documentation. There is no indication of whether any treatment is applied to this liquid and how it will be managed, nor are there any legal limits analysed from the chemicals used in the fracking fluid or its degree of toxicity. It is well known that injecting drilling residue into abandoned wells involves seismic risks (in addition to hydraulic fracturing itself) that are not assessed. The documentation states that there is no negative environmental impact based on Decision No. BE/38/01967-25/2024 of 22 July 2024. Please request the relevant decision from the Hungarian party and the documentation on which this decision was based, together with details of its management.
- No details are included about the depleted wells where the used fracking fluid will be disposed of. How far are the disposal areas from the underground aquifers? In the absence of an analysis, we consider that there is a high risk of groundwater contamination.
- The documentation includes some measurements of vibration monitoring at already drilled wells and concludes that they do not cause earthquakes. However, according to the data, small earthquakes occurred at the Hungarian border near Salonta, within the project's area of influence, during the development of the wells. The documentation must analyse the causal link between these phenomena. Fracturing activities generate micro-earthquakes of up to 2 degrees on the Richter scale. But if they overlap with tectonic fractures, over time they can produce more severe earthquakes.

Inapoi pe site Acasă Forumuri Noutăți Membri Autentificare Inregistrare Caută

Rezultate căutare pentru interogare: **Salonta**

**Cutremure Romania 2025**  
...Nereju, Romania / pop: 4,200 / local time: 12:56:28.7 2025-05-02 Eveniment nr. 3 INCDFP Reteaua Seismica Nationala: microseism in Ungaria-granita cu Romania 2 mai 02.05.2025 21:16:49 UTC 46,92N 21,39E adancime 13 km ML=1,9 Obs.: microseism crustal in Ungaria-granita cu Romania: Nord-Vest...  
GeoX · Postarea #111 · 2 Mai 2025 · Forum: Buletine seismice Romania

**Cutremure Romania 2024**  
...Crisana 14 noiembrie 14.11.2024 02:11:31 UTC 46,618N 21,679E adancime 5,4 km ML=2,0 Obs.: seism minor crustal (superficial) in Crisana: Sud SALONTA-CHISINEU-CRIS (judetul Arad) Eveniment nr. 2 INCDFP Reteaua Seismica Nationala: microseism in Transilvania 14 noiembrie 14.11.2024 08:56:50 UTC...  
GeoX · Postarea #307 · 14 Noi 2024 · Forum: Buletine seismice Romania

**Cutremure Romania 2023**  
...22 mai 22.05.2023 02:35:46 UTC 46,84N 21,51E adancime 2,0 km ML=1,9 Obs.: microseism crustal (superficial) in Crisana/granita cu Ungaria: Est SALONTA Eveniment nr. 2 INCDFP Reteaua Seismica Nationala: microseism in Dobrogea 22 mai 22.05.2023 08:49:05 UTC 44,36N 28,36E adancime 10,0 km ML=1,8...  
GeoX · Postarea #151 · 22 Mai 2023 · Forum: Buletine seismice Romania

**Cutremure Romania 2022**  
...08:07:50 UTC 46,711N 21,383E adancime 7,5 km ML=2,1 Obs.: seism minor crustal (superficial) in Ungaria-granita cu Romania/Crisana: Sud-Vest SALONTA Eveniment nr. 2 INCDFP Reteaua Seismica Nationala: microseism in Serbia-Clisura Dunarii 10 noiembrie 10.11.2022 09:21:19 UTC 44,40N 21,93E...  
GeoX · Postarea #303 · 10 Noi 2022 · Forum: Buletine seismice Romania

source: <https://forum.cutremur.net/>

- Given that more wells are to be drilled, the number of which is unknown, we consider that experience is not enough and that each well must be monitored. There is no guarantee that future hydraulic fracturing operations will not cause larger earthquakes that could be felt locally and across national borders. These analyses must be carried out in detail through environmental documentation.

### **Geological formations and water bodies**

- The assessments do not recognise that geological formations extend beyond national borders. However, the project is being carried out on a regional basin system – Békés–Codru – which does not align with national borders (RO-HU), so geomechanical processes may also be regional in scale.
- Similarly, there is no discussion of transboundary hydrogeological connections. The hydrogeological delimitation of water bodies does not depend on the country, so groundwater movements can (theoretically) cross borders. Therefore, the transboundary hydrogeological connections of deep water bodies need to be clarified. According to Law 107/1996, the water law, groundwater bodies that cross the state border are subject to supervision by the Romanian environmental authorities. Given that the activities specific to the Sarkad Corvin project in the immediate vicinity of the Romanian border have been ongoing for over three years, it is important for the Romanian authorities to ascertain and communicate, if necessary, possible impacts on the water quality of these aquifers as a result of the injection into abandoned wells in the perimeter of the exploitation of wastewater resulting from the high-volume hydraulic fracturing process, as specified in the documentation provided.
- Groundwater consumption is estimated at 13,000 m<sup>3</sup>/year, but the cumulative impact of this for all wells in operation within the perimeter and those to be constructed, as well as other water-consuming activities in the area, is not examined. In addition, the groundwater extracted to produce the fracking fluid becomes waste that cannot be reintroduced into the natural cycle. This process cannot be compared to the use of water in industry or agriculture, which circulates and returns to nature. This results in a drinking water deficit in the local and regional aquifer balance.
- Given that the area where the project is being carried out is one of the most exposed in Hungary to high temperatures, in the context of climate change, as stated in Chapter 9, we believe that the water stress of the activity should be analysed in correlation with other human activities in the area and the possible cross-border impact should be analysed. The rate of groundwater extraction should be limited so that the resource is also available for other activities, especially during the summer. As mentioned, the basin system is shared, and the activity has the potential to influence the availability of groundwater even across borders. Water shortages are already affecting local agriculture. Last year, rainfall losses in the county ranged from 150 to 200 millimetres, missing about 25% of the annual average, with corn and sunflower growers reporting [major yield losses](#). Increased shale gas production would put enormous pressure on dwindling water resources, further affecting farmers in the region.

- Regarding surface water, the conclusion of the documentation is the same: insignificant impact. However, the impact is not specifically analysed, even though the exploitation is located near the Koros/Cris River and other local surface waters:



Source: [Waterknowledgehub.org](http://Waterknowledgehub.org)

- The documentation states that the installation of the gas pipeline requires the consent of the water administrator for subversion. However, this consent should already be part of the environmental documentation to ensure that there is no negative impact on water bodies and that the procedure is already established.

### Greenhouse gas emissions:

- Although these have more of an impact on national policies, emissions do not have borders and have a significant effect on global climate change. This project may undermine European efforts to reduce greenhouse gas emissions and achieve climate neutrality, as it will be in use for over 40 years. At the same time, the negative impact on climate change resulting from the burning of extracted fossil fuels is not recognised. Nor is the total amount of hydrocarbons extracted throughout the project estimated, making it impossible to fully estimate emissions. Therefore, the total calculation of greenhouse gas emissions is incomplete and does not include emissions during construction or decommissioning, nor does it include scope 3 emissions (from the use of extracted hydrocarbons).
- The documents discuss the elimination of flaring, which is currently carried out as part of the project and is prohibited by the new European regulation on methane. However, the information presented is confusing. The flaring stack is found in both versions of the station, although Table 3.3 also includes the gas turbine, which is presented as an alternative to flaring in the expanded project. Chapter 8 states that the gas turbines will be installed after authorisation, so it makes no sense to authorise the project with a flare. At the same time, there are no plans to eliminate venting, which is also restricted by European regulations.
- According to recent [World Bank](http://World Bank) data, the Corvinus gas project was the most wasteful flaring operation in Hungary in 2024: the 36.5 million cubic metres of gas

flared at Nyékpusztá accounted for 62% of total flaring in the Hungarian energy sector.

- We appreciate the inclusion of the LDAR monitoring programme and emergency/accident measures. We believe that these should be presented to the Romanian public in order to clarify the dangers to which citizens may be exposed in the event of an accident and how the authorities will respond.

### **Polluting emissions**

- Air quality measurements in the current situation identify benzene emissions and low mercury emissions. Although these do not exceed the limit values, it should be noted that exploitation is currently low and these emissions may increase as the number of wells increases.
- The project impact analysis does not even identify sources of pollution such as benzene or mercury. We tend to believe that the source of pollution is the treatment plant itself, which, according to [measurements](#) taken by Greenpeace Hungary, emits benzene. This makes us question the quality of the environmental report prepared for the project. It [is](#) also [known](#) that gas obtained through fracking may contain mercury.
- We believe that the impact of pollutants should be re-examined to include these substances, which have a significant impact on health and potential cross-border impact.
- Pollutant emissions are not analysed for the entire project but for each component separately. Their cumulative impact must be taken into account, especially since some activities will be carried out in parallel (e.g. gas extraction, processing and combustion in turbines).
- In some cases, CO and NO<sub>x</sub> pollution exceeds the permitted limits. These situations should be avoided, and mitigation measures be proposed.
- The health effects are treated superficially, without any analysis of the impact on the communities near the station. This leads us to believe that the neglect over own citizens may also be reflected in the quality of the cross-border impact analysis.

### **Protected areas**

- The mining perimeter intersects two Natura 2000 sites and nine others are nearby, the closest being 4 km away. The company that carried out the analysis decided that there was no significant impact, so the appropriate assessment procedure was not carried out. However, we believe that this procedure should be done, given the magnitude of the project and the fact that some areas are located within the mining perimeter itself.
- The closest protected sites in Romania are Salonta (ROSCI0387), Pescăria Cefa - Pădurea Rădvani (ROSPA0097), which is home to Romania's last population of bustards, and Crișul Negru (ROSAC0049), a site connected with Körösközi erdő (HUKM20011), located approximately 10 km away. These sites are not even mentioned in the environmental assessment of the project.

- In Chapter 6, the impact on flora and fauna is analysed superficially, without any details on the species or types of habitats existing in the perimeter. The impact on protected areas must be analysed for all installations within the project and cumulatively.
- The documentation assesses the impact of existing wells rather than looking at those planned for which the environmental permit is being issued. It could not do so because it does not know their location, a serious shortcoming for which we believe the procedure should be restarted.

### **Issues regarding democracy and legal procedures**

- One concern relates to the rule of law and legal procedures in the development of the project. In the initial procedures initiated by the environmental authorities, [Greenpeace Hungary was unlawfully excluded](#) and unable to exercise its legally guaranteed rights, including access to project documentation and the right to express its views. As a direct consequence, Greenpeace was also deprived of its right to challenge the decision to issue the environmental permit. Following an appeal by Greenpeace Hungary and Friends of the Earth Hungary (MTVSZ), the appeal authority recognised this serious procedural violation and ultimately annulled the environmental permit. It was explicitly found that the first instance authority had violated the right to a fair administrative procedure, a right protected not only by Hungarian law but also by the EU Charter of Fundamental Rights and relevant Council of Europe standards. This case illustrates how the systematic restriction of NGO and civil society participation in environmental decision-making in Hungary undermines democratic safeguards and weakens environmental protection outcomes, particularly in cases such as shale gas extraction through hydraulic fracturing, which poses significant risks to ecosystems, public health and the rights of future generations.

To conclude, the analyses presented are incomplete, the assessment procedure is flawed, resulting in an environmental report with low credibility. The omitted information is very important for determining the real impact, both locally and across borders. We believe that the Romanian Ministry of the Environment should participate in the cross-border assessment procedure and request the Hungarian side to complete the information and re-analyse the impact accordingly.

**Yours sincerely,**

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