

To Whom It May Concern,

I am very concerned about this proposal and object to it for the many reasons below:

- Aboriginal heritage is not adequately assessed. No detailed new surveying of the area for Aboriginal cultural heritage has taken place yet. Especially in light of the recent reports where Rio Tinto blew up known Aboriginal sites.
- The Narrabri gas project threatens the living heritage of Gamilaraay peoples.
- The approach taken by Santos to site its facilities with the intention of avoiding “areas of high cultural heritage value to local Aboriginal groups” fails to understand the landscape scale connection to Country and the holistic responsibility as protectors of Country that is intrinsic to Gamilaraay culture.
- Santos proposed to undertake detailed surveys after it gets approval and avoid newly found sites of high significance, but this is a highly risky strategy and once granted, the approval will not be able to be revoked.
- Extracting and burning gas will make the climate crisis worse. Science dictates that no new fossil fuel basins can be opened, if we wish to mitigate extreme weather events already impacting us all right now.
- NSW does not need more gas resources which fuel dangerous climate change. An October 2019 report from Pegasus Economics states solar and wind is developing faster than expected, reducing in cost and already displacing the need for gas-fired electricity.
- Total greenhouse gas emissions produced by the project could be 127.8 million tonnes of carbon dioxide equivalent, or 5 million tonnes a year. In a time when Australia is struggling to meet its commitments under the Paris Climate Agreement, this one gasfield would increase Australia’s greenhouse gas emissions by nearly 1% per year.
- The Pilliga Forest is a critical recharge area for the Great Artesian Basin. Australia is the driest inhabited continent on earth. We cannot afford to gamble with our water. Underground aquifers, like the Great Artesian Basin, support life across inland Australia. CSG drilling is simply not worth the risk.
- Santos has used the most basic level of groundwater model because of how little is known about the deep aquifers they will dewater to extract gas.
- Over 20 years, Santos will remove 37.5 billion litres of water from deep below the Pilliga and removing this water will cause depressurisation and loss of water in the Pilliga Sandstone, the southern recharge of the Great Artesian Basin, which outcrops in the Pilliga.
- The Department of Planning is downplaying the importance of the Pilliga Sandstone as a recharge aquifer of the Great Artesian Basin and claims that there will be “ no significant impact ” but in reality, there is not enough information for them to make this claim.
- There is still no adequate plan to safely and responsibly dispose of salt waste from the project which is set to be 117 tonnes or two B-double trucks of salts waste every day, during peak production. The plan to dispose of it in nearby landfill is inadequate as no capacity evaluation of the landfill has been undertaken. Salty waste will leach from landfill and contaminate groundwater, farmlands and ecosystems.

- The NSW government's approach is to approve the gasfield first and trust Santos to prepare a strategy for reuse or disposal of this waste before full development, but as the EPA has pointed out, Councils who run waste disposal facilities do not have to accept Santos' salt waste.

Already, Santos has recorded over twenty spills and leaks of toxic CSG water. Over 10,000 litres of CSG wastewater was spilt, causing forest dieback that is unremediated seven years later. An aquifer has been contaminated with uranium and heavy metals. Expert analysis shows that up to 130 spills are likely, over the project life. We cannot take the risk of chemical or salt leakage, accidents and spills.

- The Government's failure to implement the 2014 recommendations of the NSW Chief Scientist and Engineer amplifies the risks of this project and means it must be refused.
- A NSW Legislative Council inquiry in February 2020 found that the Government had fully implemented only two of the 16 recommendations and half had not been implemented at all.
- The Chief Scientist recommended enhanced insurance coverage for the coal seam gas industry but this has not been implemented. The parliamentary inquiry described the industry as "uninsurable." The NSW EPA' says getting insurance is "not straightforward" and "Operators choosing not to hold relevant insurance will be required to instead prove to the EPA the existence of sufficient potential clean up funds." There is no mention of this "requirement" in the Assessment Report or draft consent prepared by the Department.
- The Department's own Water Expert Panel noted that the Chief Scientist urged that "drilling is allowed only in areas where the geology and hydrogeology can be characterised adequately" but that the Panel is not confident the information provided by Santos meets that threshold.
- 35 threatened animals and 10 threatened plants (within the project area) rely on the Pilliga for survival—including the endemic Pilliga Mouse, Squirrel Glider and Black-striped Wallaby. It also forms part of a stronghold for threatened woodland birds including the Glossy Black Cockatoo and Diamond Firetail.
- The Pilliga is the largest temperate woodland in NSW. Santos' proposal to clear nearly 1,000ha of the Pilliga will cause significant fragmentation within the forest, including habitat for the critically endangered Regent honeyeater and for koalas which have already lost 30% of their habitat within NSW in the Black Summer fires. It is thus crucial to the survival of the koala that its bushland habitats be spared industrialisation.
- The Department states " the project is unlikely to significantly impact any of the identified threatened fauna species, given the relatively small area of habitat removal and the presence of large areas of suitable habitat in the region ." However, the report fails to take into account cumulative impacts of mosaiced habitat clearance. Santos' proposal to industrialise 95,000 hectares, clearing close to a 1,000 hectares would result in significant impact to threatened fauna species. The project has the potential to impact threatened fauna through direct habitat clearance, habitat fragmentation, vehicle strike and predation by pest species. This could disrupt the breeding cycle and adversely affect habitat critical to the survival of these species.
- There have been no baseline population surveys of the Pilliga Mouse. Thus approving this gas field would likely breach the Environmental Protection and Biodiversity Conservation (EPBC) Act. The future of the Pilliga Mouse is threatened by this project due to the spread of invasive predator species, and consequent increased rates of predation; the increased fragmentation from access tracks and dispersed clearance potentially creating unfavourable microclimates, open space, and

traffic disturbances. The loss of habitat in small patches across connecting lines is significant and would result in species decline and potential extinction.

- The project should not be approved as the Assessment Report fundamentally fails to assure there is adequate knowledge and understanding of the current status of the Pilliga Mouse or all 35 threatened fauna in the project area or of an appropriate management regime.
- Infrastructure of the Narrabri Gas Project poses a serious bushfire risk due to its highly flammable nature and the Assessment Report fails to adequately account for how this risk will be managed.
- The RFS has repeatedly expressed serious concerns about the operation of a gasfield and its burning flares in a highly flammable landscape like the Pilliga.
- From December 2013 to January 2018, at least 17 Pilliga bushfires have been recorded.
- The Department states the project would “ put downward pressure on gas prices .” However, the Institute for Energy Economic and Financial Analysis (IEEFA) states production costs at the Narrabri Gas Project are some of the highest in the country, with estimates to supply major domestic markets as high as \$9-10/GJ. Currently in Australia customers seeking long term contracts are paying between \$9-12/GJ to secure gas, leaving little room for profit generation. The project will clearly be at a globally uncompetitive price for gas.
- Claims of job creation are crucial to the project’s justification, with an anticipated average 190 jobs created locally and 322 in the rest of the state, but this increase comes at other industries’ expense. The economic assessment found that there would be lost employment in agriculture, manufacturing and mining as a result of the project.
- Coal seam gas brings upheaval and division to rural communities. In southern Queensland, a CSIRO survey in 2014 found that only 6% of local people living in gasfield areas thought that the industry has improved their lives. In comparison, 42% said that they were “not coping” or “only just coping” with the changes the industry has made to their lives.
- Santos’ own assessment found that there would be “almost certain” impacts on housing affordability for Narrabri residents, which will disproportionately affect low-income households and Indigenous people, who are far more likely to be renters.
- During the construction period, the presence of a predominately male non-resident workforce will change the gender balance in the community from roughly equal men and women to 56% men, 44% women. This “masculinisation” has been observed to have negative social consequences in other communities with a fly-in fly-out mining workforce.

Yours sincerely,

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