

Submission opposing the Narrabri Gas Project

Thank you for the opportunity to make a submission opposing the Narrabri Gas Project.

Since the 1970s I have spent enjoyable times bushwalking and exploring our country including the Pilliga woodlands. Over the last 50 years I have witnessed the decline of Australia's beauty and biodiversity. I now see fewer native plants and animals and more and more encroaching development.

Governments should lead the way, but it saddens and frightens me that we have to fight our government to save our environment.

I have read many of the key documents including the Department's assessment report for the Narrabri Gas Project and conditions of consent and I cannot find a single reason why this project should be approved. Experts cannot agree on its impacts. But most importantly the Department has failed to establish that this proposal, which is short on detail, is in the public interest. Added to which the draft conditions of consent are so loosely framed they will be unenforceable.

This is a **suck it and see** project... let's suck the gas and water from 1000m deep below the Great Artesian Basin again and again up to 850 times and see what's in the gas and saline water brought to the surface. Then sell the gas and sit back and see what happens.

A record number of Australians object to this proposal and Santos has no social licence to mine the Pilliga. And with their track record of repeated pollution offences, Santos despite being an experienced miner of gas has demonstrated that accidents will happen and the risks are great.

The Office of the Independent Planning Commission has an obligation to decide the outcome based on the local and global impacts of this project over the longer term and the community response to this proposal.

This proposal must be refused.

Department of Planning assessment report

Much emphasis is placed on the Department's assessment report but it does not hold up to scrutiny.

The Department says this project is critical for energy security and will drive gas prices down. That cannot be true.

Given that Australia is the world's largest exporter of LNG it is hard to see why this project which will produce less than 50% of NSW's current gas needs is crucial to NSW's energy resource security in a changing energy market. And in the wider scheme of things a single CSG mine is unlikely to have any effect on gas prices.

The assessment report concludes: "... Santos has designed a project... that achieves a **reasonable** balance between maximising the recovery... of gas resources of State significance... and minimising impacts... **as far as practicable.**" (Page 122, Para 602, my emphasis)

I take this to mean assess each of the many risks and the time, effort and money to reduce those risks against the need for an important gas resource and do what you can. This is double-speak for:

extract as much gas as possible and we'll wear the impacts

This is not acceptable particularly when Santos has not yet designed and defined a gas field, and we have no idea where the balance between mining the gas and minimising impacts lies.

Moreover, a project of State significance is usually measured in monetary terms and yet the assessment report reads as if the gas itself is somehow State significant.

In the meeting with the IPC, David Kitto, then Executive Director, Special Projects claimed the assessment report as his own, and in response to a question about uncertainties which will not be known until the mine is operating, he said:

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So there's a lot of detailed work that will go on, but you can only really find out some of those things to minimise the risk. But it is minimising them within a broader conclusion that those risks are quite low. So it's actually more managing it at a management level to say if, for instance, you do pick up in certain strata that there are weaknesses in a certain area or the aquitard thins out in a certain area, you might avoid drilling wells in those sorts of areas and so on. So it is about managing risk and obtaining that information over time. So I think when we're saying there's – there is some evidence from the exploration and the work that has been carried out, but it's not like, for instance, coal mining in that area where it's been happening for 20 40 years and you've got a lot more empirical evidence about the specifics.

So there are some uncertainties and I think we've got quite a good idea about the things that we really want information on, particularly the geology and structure and, you know, those sorts of things. But in terms of certain things like seismic risk and substance risk and some of those, we really rule those out as being key issues for this area. So it is really down to integrity of the geological strata, the composition of the gas and the water from a management perspective. I think those are sort of the key issues. And phase 1 will get us a lot more data on that, but then the idea is to do everything in an incremental way with, you know, checks and balances along the way so that you're not just rolling out all 850 wells. You know, you can adapt over 35 time based on any new information that we get and we can manage that risk.

MR YOUNG: And Mike Young here, David. Is it fair to say also that there's, you know, requirements for them to meet certain objectives and demonstrate that they 40 have been meeting those impact objectives or outcomes, performance measures, over time - - -

MR KITTO: Yes.

45 MR YOUNG: - - - and that they need to demonstrate that progressively so it's not

(Screen shot from page 27 transcript of IPC meeting)

Well, that makes everything as clear as mud. Neither the Department nor Santos know what the risks are, but in the wider scheme of things they will be low because Kitto says so... we'll let them drill down and when they find a weakness we'll let them drill somewhere else... until they have 850 low risk wells. Then we'll find out what's in the gas and the water and maybe we might find out whether the geological strata will hold up. Only then will we understand the risks. And maybe after 40 years we'll understand more about what we are doing and maybe even work out a method of disposing of all the salt.

So, this is a special project deemed approvable by the Director of Special Projects whose title I note has changed yet again to something about business systems.

Special indeed because we don't know what Santos will do, where they will do it or how they will do it... but don't worry it will be worth it because NSW needs cheap State significant gas at any cost. That is not a sound business decision.

What price will Australia and future generations pay for an experimental **suck it and see** project:

let's extract as much gas as we can whilst minimising impacts if we can

This experimental approach to coal seam gas mining a significant woodland is a high risk and high impact proposal.

And we are expected to believe that the predicted footprint will be reduced by 30% when Santos, after 10 years of exploration in the area, can't tell us where the gas wells will go.

And finally, the Department says in its conclusion: "... any other unspecified residual impacts will be reduced through effective community engagement..." (Page xix)

Eh? What are these undefined residual impacts? And how precisely will they be explained away when we don't know what they are?

The assessment report is contrived to get a preconceived outcome and down plays the impacts of this project when the geology of the deep strata, the fault lines, the composition of the gas and water extracted from the aquifer is not understood, and after almost 10 years of exploration and investigation numerous crucial management plans have yet to be developed and approved.

The risks are unknown and there are many uncertainties.

The Pilliga is **not** the place for a CSG mine which NSW does **not** need. And the majority of Australians do not want more CSG.

Conditions of consent

The conditions of consent (CoC) are supposed to define the project parameters for the life of the project so as to minimise its impacts and maximise its benefits.

Effective conditions of consent must be worded clearly and enforceable. However, the CoC for the Narrabri Gas Project are loosely worded to reflect the experimental nature of this project and give Santos considerable latitude in how they conduct their operations.

The phrase ***reasonable and feasible*** is used many times in the CoC to define the measures Santos should attempt to implement so as to avoid causing harm to people and the environment in relation to noise, flaring operations, blasting, air quality, leaks and spills, salt management, groundwater modelling, biodiversity and heritage, aboriginal culture, visual impact, waste disposal and finally rehabilitation after 20 odd years. That's just about every conceivable risk except air pollution and climate change.

These CoC are subjective and unenforceable.

The phrases ***as soon as practicable*** or ***reasonably practicable*** make it possible for Santos to evade obligations on issues like fugitive emissions and bushfire risk and suppression - the very things the EPA and the RFS have expressed concerns about.

Santos need only ***generally*** follow guidelines concerning the care of riparian and aquatic ecosystems as well as rehabilitation.

The EPA, lead regulator for gas activities, said the use of this vague terminology makes the CoC subjective and enforcement will be difficult. And yet the vagaries remain in the CoC. Why? And why has the EPA changed its tune?

And so, every impact that the Department can think of has an escape clause - do what needs to be done to get the gas.

The Department considers this ill-defined project approvable with conditions on all impacts which need only be implemented generally if Santos judges them to be reasonably practicable. What a joke... except that it is not funny.

In other words, Santos can do anything it likes with impunity.

Equally important, there is no provision in the CoC to stop the development once it has begun. But history shows that there is plenty of scope in the planning process to modify the project meaning expand the mine, change how the gas is mined, maybe introduce fracking and extend the life of the mine once it is approved. There is not a single reason why this project should be approved.

It is a high risk, environmentally damaging venture to extract a polluting energy resource we do not need, and which will contribute to climate change now and in the future. And future generations will bear the cost of the inevitable environmental damage and loss of species.

To date the IPC has received a record number of unique objecting submissions making it resoundingly clear that Australians are concerned about the impacts of this proposal and do not want this CSG mine.

This proposal is not in the public interest, not now or in the future.

The proponent and the Department have had more than enough time to stitch together a feasible project and they have failed to do so.

Please refuse this proposal now and finally put an end to this.

Brenda Gerrie

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August 2020