

# **Concern Residents Against the (Queensland Hunter Gas) Pipeline. (C.R.A.P)**

## **Introduction to our Group and our concerns:**

Our Liverpool Plains Shire based group was formed recently in 2020 after the Queensland Hunter Gas pipeline *Modification Extension* in October 2019 was approved by the NSW Department of Planning (DPIE) - extending the QHGP projects build date approval out to October 2024 over landholders properties, with scant regard for owner and resident liaison or due regard for their individual concerns.

Our groups central aim is to voice our landholders and broader community's concerns over this pipeline approval in regards to:

- *Build approval in Zone 1* – the ground water supply for Quirindi and farmers to the south and west of Quirindi. This pipeline is approved to be buried under Borambil creek, and will be in our town water supplies water table – surrounded by water, and near to the pumping station.
- Constructability and safety issues of the pipeline buried in the Liverpool Plains Vertisol soils.
- Concerns over the spread of Coal Seam Gas and its related infrastructure into our region.

These are our groups initial primary concerns, but they are not limited to these concerns alone.

Our members and committee work closely with similar based groups in the Hunter Valley and the Moree area in NSW, as well as groups with similar agricultural concerns across the Northwest of NSW.

**We write this submission to state our *strong* objection to the Santos Narrabri Gas project.**

## **Concern for other community members in our region:**

We hear and acknowledge the vast concern and risk of the Pilliga Santos Narrabri Gas project and its potential detrimental effect on the Great Artesian Basin, in either its recharge ability and the risk of Coal seam gas well construction through various layers of aquifers - for potential failure over time.

We acknowledge our fellow community members huge concern of living in a gas field, and their desire to NOT live in a gas field region and their right to self determination and democratic choice - and to voice their huge concerns over these developments and intrusions into their homes, lives, environment and future.

We want our agricultural pursuits and natural assets respected, protected and acknowledged in their necessity and long term viability – which is at stark odds with the short term nature of the Coal seam gas industry and its longevity potential in an ever moving fast-passed energy sector that is undergoing tremendous amounts of change and financial variability in the shift to renewables, global markets and the Covid19 pandemic situation.

**A limited background to *Landholder concerns* re the Queensland Hunter Gas Pipeline development:**

The pipeline will be buried within Quirindi's Zone 1 water supply, under Borambil Creek placing it in the water supply for the Quirindi township and many farmers to the west of Quirindi. Analysis of 50 years of historical data shows the pipeline will be submerged 60% of the time in the groundwater. This exposes Quirindi and the farmers reliant on the water to possible pipeline leaks or contamination from protective coatings applied to the pipeline, risking supply of our highly reliable and only source of water supply for many of those in this area, and the town.

In the attached report attachment '*MGPA-SFC report*' prepared specifically for the client, the Mullaley Gas and Pipeline Accord (2011), the report highlights significant issues regarding the emplacement of high-pressure gas pipelines in the Vertisol soils of the Liverpool Plains due to the high shrink and swell properties of these very high clay content soils. The report identified that gas pipelines would have "a high risk of failure". Further analysis within the report concludes that **"it is impractical to place a safe and stable gas pipeline through Vertosol soils"**. The findings and opinions in this report are based on research undertaken by Robert Banks (BSc Hons, Certified Professional Soil Scientist, Dip Bus) of SoilFutures Consulting Pty Ltd, independent consultants (Gunnedah).

The proposed pipeline route traverses a considerable amount of irrigation and dryland cropping land within the Liverpool Plains Shire Council area. If easement agreements are reached the pipeline company will require 24 hour right of way access for the 40+ year life of the pipeline. As a result of the required access many issues have been raised, including but not limited to: Concern over raised levy bank style embankment over pipeline for many years as pipeline soil cover resettles, subsides, and compacts over pipeline. Safety and physical access for urgent repairs after a damaging rainfall-runoff or when irrigation events occur. Limitation to crop choice due to the pipeline company needing 24-hour access. Biosecurity concerns if vehicle wash down facilities are not available for every property. Ongoing erosion concern, natural water flow, and irrigation infrastructure impeding the current route.

With no acquired easement agreements for this pipeline, the approved corridor does not appear in land title searches. There are local landholders who have recently purchased, or via land transfer assumed ownership of land subsequent to the project's approval with no knowledge of this approved high-pressure gas pipeline corridor. Landholders in other LGA areas have built homes and other infrastructure within the approved corridor, and nothing was noted on the local council supplied planning certificates.

In written correspondence with Gunnedah Shire Council, Council have advised that this development would not appear on any S10.7 planning certificate. "There are no mechanisms for this development to appear on a S10.7(2) certificate and a S10.7(5) certificate. There is a place on such certificates to list development consents that have been issued by Council within the past five years from the date of the issue of the planning certificate. This development was first determined in 2009 and as a consequence Council does not note this on any lot within the Gunnedah LGA that is impacted."

Upper Hunter Shire Council has also advised in the February 2020 Council meeting minutes, that "The development does not currently appear on 10.7 Planning Certificates issued by council. This is currently

being addressed so that all future planning certificates relating to affected land (within 100m of the pipeline) will include a notation regarding the approved development".

In written communication with two local landholders, Hunter Gas is now advising that the 500mm wide approved pipeline, is in fact to be a 600mm pipe. This significant change was not part of the recent date extension and not approved in the terms of the project. Many hold reservation and concern over what this significantly larger piece of infrastructure would mean in terms of possible introduction or expansion of the Coal Seam Gas industry into our immediate locale.

During the 2018 Planning Department *Modification* process the application did receive near to 200 objections and comments - from those who were alerted to the planning modification process. There was only 1 supporting submission to the extension application – this was submitted by Weston Aluminium, a gas user in the Hunter. There is ownership crossover of both the proponent company who owns the pipeline corridor, Hunter Gas and Weston Aluminium - in fact they share Managing Directors in Mr Garbis Simonian.

In mid June 2020 Landholders were alerted by the Department of Planning “Energy Networks Team” that a “Application to Survey” request that has been made to the NSW Government from Hunter Gas Pty Ltd, and that the application is being assessed in accordance with the Pipelines Act 1967 with a recommendation to be made to the Minister for Energy.

After 9 years of no direct contact from Hunter Gas - landholders started to receive letters dated July 13 2020, maps of their properties with pipeline route indicated over their landholdings, and a small promotional pamphlet - in mid July 2020.

**Narrabri Gas project EIS relevant pipeline mentions *in relation to movement of gas from site to market:***

Having searched the Narrabri Gas project EIS documentation, we refer the IPC to these points within the EIS for additional commentary, research and analysis in relation to the approved Queensland Hunter Gas pipeline:

**EIS Forward (PDF PAGE 3)**

- *“The natural gas will be made available to the NSW market via a dedicated pipeline to be constructed by APA Group, which will link into the existing Moomba to Sydney Pipeline.”*

**EIS Executive Summary, What is proposed? (PDF PAGE 3 / ES 1)**

- *“The gas would be made available to the NSW market via a high-pressure gas transmission pipeline which would connect to the existing Moomba to Sydney gas pipeline. The pipeline will be constructed and operated by specialist pipeline company APA Group, and is not part of this project Environmental Impact Statement. (EIS).”*

**EIS Chapter 1, Introduction (PDF PAGE 5 / or 1-1)**

- *“The gas would be made available to the NSW market via a high-pressure gas transmission pipeline which would connect to the existing Moomba to Sydney gas pipeline. The pipeline will be constructed and operated by specialist pipeline company APA Group, and is not part of this project Environmental Impact Statement (EIS).”*

**EIS Chapter 8, Assessment of alternatives (PDF PAGE 13 / OR 8-9)**

- *“Gas would be made available to the NSW market via a high-pressure gas transmission pipeline. The pipeline will be constructed and operated by a specialist pipeline company and is not part of the EIS for this project. It is likely that the gas transmission pipeline, starting at Leewood, would tie into the Moomba to Sydney pipeline located to the south of the project area.”*

**DPIE Assessment report from June 2020 for the Narrabri Gas project relevant pipeline mentions *in relation to movement of gas from site to market:***

Although the Narrabri Gas Project requires a connection to the existing pipeline network in NSW, Santos is not seeking approval for this pipeline as part of the project as it is likely to be delivered by another party and to be subject to a separate approvals process.

At present, there are two options:

- connecting the project to the approved Queensland-Hunter gas pipeline located to the east of the site; or
- developing the proposed Western Slopes Pipeline, which would connect the project to the Moomba-Sydney pipeline to the west of the site.

Given the uncertainties with both options, Santos has agreed to accept a condition requiring it to ensure there is an approved pipeline connection for the project prior to construction and that the pipeline is in place prior to starting any gas production.

The Department has included this in the recommended conditions.

**Questions for Santos and the IPC in regards to the EIS in relation to more recent public disclosures:**

**Question 1:** It has now been revealed in the IPC June 2020 transcripts in meetings with Santos representatives, that Santos are in discussion with *Hunter Gas* in regards to possible usage of their approved route being the *Queensland Hunter Gas Pipeline* to evacuate the Narrabri Project Gas *eastwards* in direction from project site to market places.

Is it required to update the EIS to reflect this change in evacuation route as previously described in the EIS indicates APA Group a *south west* direction and a desire to connect to the Moomba to Sydney gas pipeline.

**Question 2:** In regards to the References section of the EIS, there is no mention of the approved high pressure gas pipeline route the *Queensland Hunter Gas Pipeline* that was approved as a 200m wide corridor in 2009 for a then 10 year period, in which a 500mm wide pipeline is proposed to be developed in the region close by to the Narrabri Gas project area.

The EIS References file notes several coal mines established and proposed for the nearby region, such as the Narrabri coal mine, Maules Creek coal mine, Boggabri coal mine and Watermark coal mine.

Why would this approved project be omitted from the most basic of EIS disclosures in the planning purposed for the Santos Narrabri Gas project, especially now it is coming into context as a potential evacuation option for the project to move its gas from site to market places?

The Queensland Hunter Gas pipeline was originally proposed to bring gas from Queensland into the NSW market place, this pipeline would be a bi-directional flow pipeline. If this pipeline is built and connected to the Narrabri Gas project, what conditions should be applied that might preclude the gas extraction from not only being sent south to Newcastle, but also north, into the gas exporting heavy Queensland market?

In May 2017 Hunter Gas made it publicly known that it has a Memorandum of Understanding with Jemena to complete a partial build to the Queensland Hunter Gas pipeline, being a "Phase 1" Narrabri to Newcastle, there was no advice to host landholders nor has this been amended in the approvals for the Queensland Hunter Gas pipeline.

## Queensland Hunter Gas Pipeline joins with Jemena for stage one for Santos Narrabri approval

Perry Duffin

MAY 4 2017 - 10:19AM

**STAGE ONE:** The first leg of the Queensland Hunter Gas Pipeline could be built in 12 months, if the NSW government approves a gas project at Narrabri this month.

A massive pipeline project that will link the Hunter and Newcastle to the fertile gas fields in western NSW and Queensland is one step closer to being completed.

And while the companies behind the construction say it will create hundreds of jobs, kick-start industry and solve the state's looming gas crisis – it all hinges on the approval of a gas project in Narrabri.

Queensland Hunter Gas Pipeline and Jemena have reached a Memorandum of Understanding (MOU) for Jemena to build and operate the \$500 million first stage of the pipeline which runs from Narrabri to Newcastle.

The pipeline has a development approval in NSW and is ready to be built. It will take approximately 12 months to construct.

The project's managing director Garbis Simonian, who also operates Weston Aluminium, said the privately financed venture would kick-off as soon as the NSW Government approved the \$3 billion dollar Santos Narrabri Gas Project.

"We're optimistic there will be no showstoppers and [the Santos project] will be approved," Mr Simonian said.

The proposed project is on public exhibition until May 22 and Mr Simonian called for people to make submissions in support of Santos.

"Gas prices have doubled, there's a serious shortage leading to a gas and electricity crunch," he said.

“Gas is critical for the state’s industry, but also for electricity in homes. So develop Narrabri, but bring it through Newcastle.”

Gas in the Hunter has previously garnered support from both sides of politics, including Federal Member for the Hunter Joel Fitzgibbon.

Mr Simonian said Santos was interested in using the proposed Western Slopes Pipeline, which would bypass Newcastle and go straight to Sydney.

He said Santos’ needed to send extra gas to its liquid natural gas operations, which focuses on exporting the product overseas.

“You can bet your bottom dollar that gas will go north to [Santos’] Liquid Natural Gas in Queensland,” he said.

“This is about making sure the gas doesn’t get hijacked.

“If it comes through our pipeline it’ll be for [Hunter] industry first, and what’s left will go to Sydney.”

Natural gas has had a troubled history in Australia over the past decade. A groundswell of community opposition against projects at Fullerton Cove and Gloucester chased the industry out of the region in recent years.

Much of the opposition centres on environmental concerns, and Santos’ Narrabri projects have previously come under fire for contamination breaches.

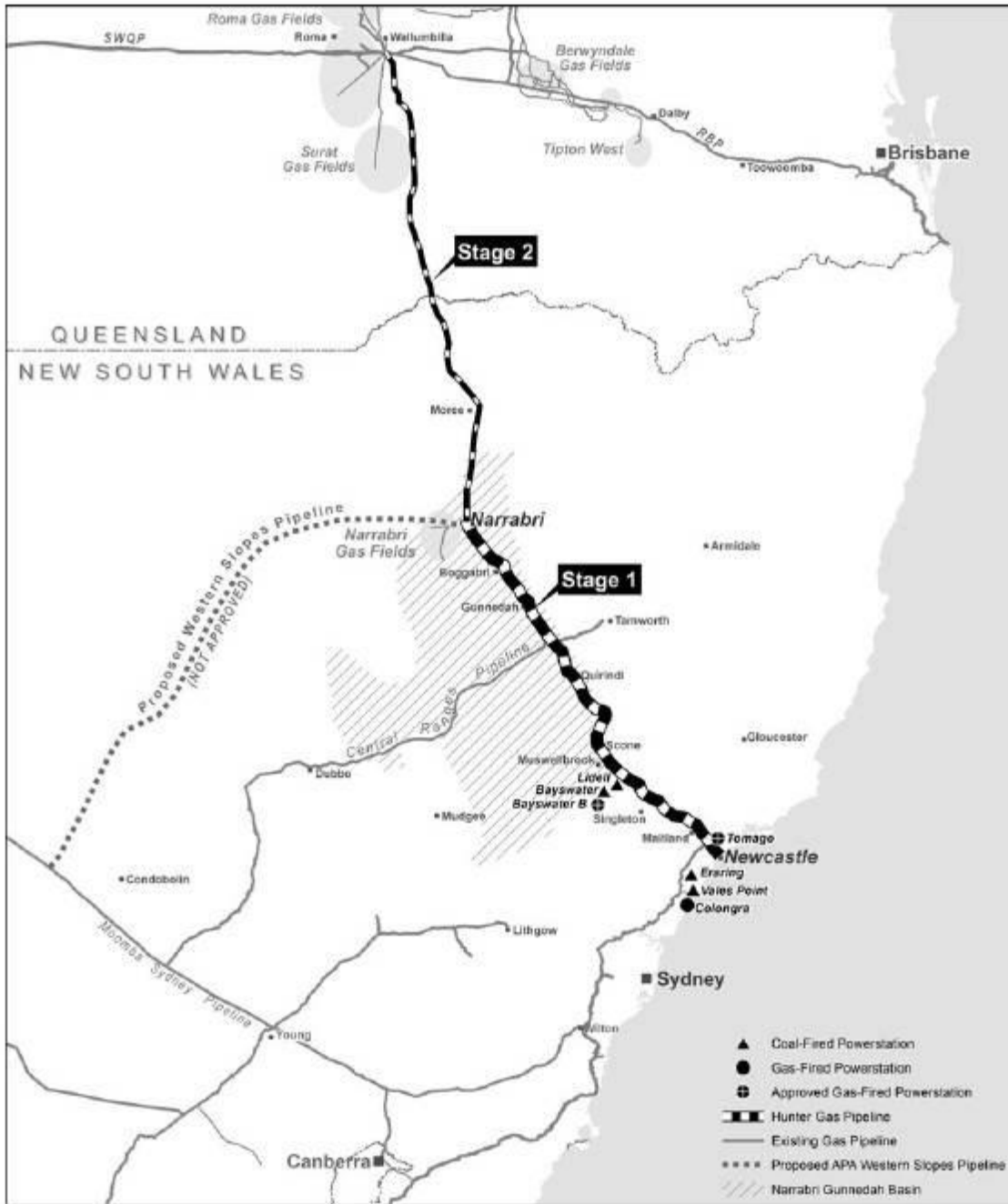
Mr Simonian said he understood the concerns, and personally opposed gas projects in prime agricultural land, but the state’s inaction on developing the industry was pushing it toward the blackouts that plagued South Australia over the last few months.

“You can’t allow [gas fields] in high value agricultural land, but it’s not our there,” he said.

“You can’t lock up the whole state.”

<https://www.maitlandmercury.com.au/story/4639703/construction-of-queensland-hunter-gas-pipeline-to-begin/>





Map sourced from article:

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The following detail is sourced from the Hunter Gas pipeline website, referencing the size and estimated construction timing, cost and potential jobs. This significant project for the region is not referenced in the broader EIS analysis as potential development for the region, when other large projects are referenced within the EIS analysis:

[huntergaspipeline.com.au](http://huntergaspipeline.com.au)

#### *ABOUT THE PIPELINE*

*The Pipeline is designed to be approximately 833kms in length, running from Wallumbilla in Queensland to Newcastle in NSW. The following local government areas will be served: Narrabri, Gunnedah, Liverpool Plains, Upper Hunter, Singleton, Muswellbrook, Maitland, Port Stephens and Newcastle.*

*Project value is estimated to be \$1.2 billion, creating 350 construction, 20 operational and maintenance jobs. The Pipeline will be steel in construction, buried approximately 750mm below the ground and operate at high pressure.*

#### *Hunter Gas Pipeline Project*

*Hunter Gas Pipeline Pty. Ltd. (HGP), with an established pipeline partner, proposes to build and operate a high pressure, underground (minimum depth of cover 750mm) steel gas pipeline to transport gas from the Wallumbilla Gas Hub near Roma in Queensland to Newcastle in NSW via Moree, Narrabri, Gunnedah, Quirindi, Scone, Muswellbrook, Singleton and Maitland.*

*HGP has Development Approval in place from the NSW Government, the Queensland Government and The Australian Federal Government, (see "Approvals" in the Information section).*

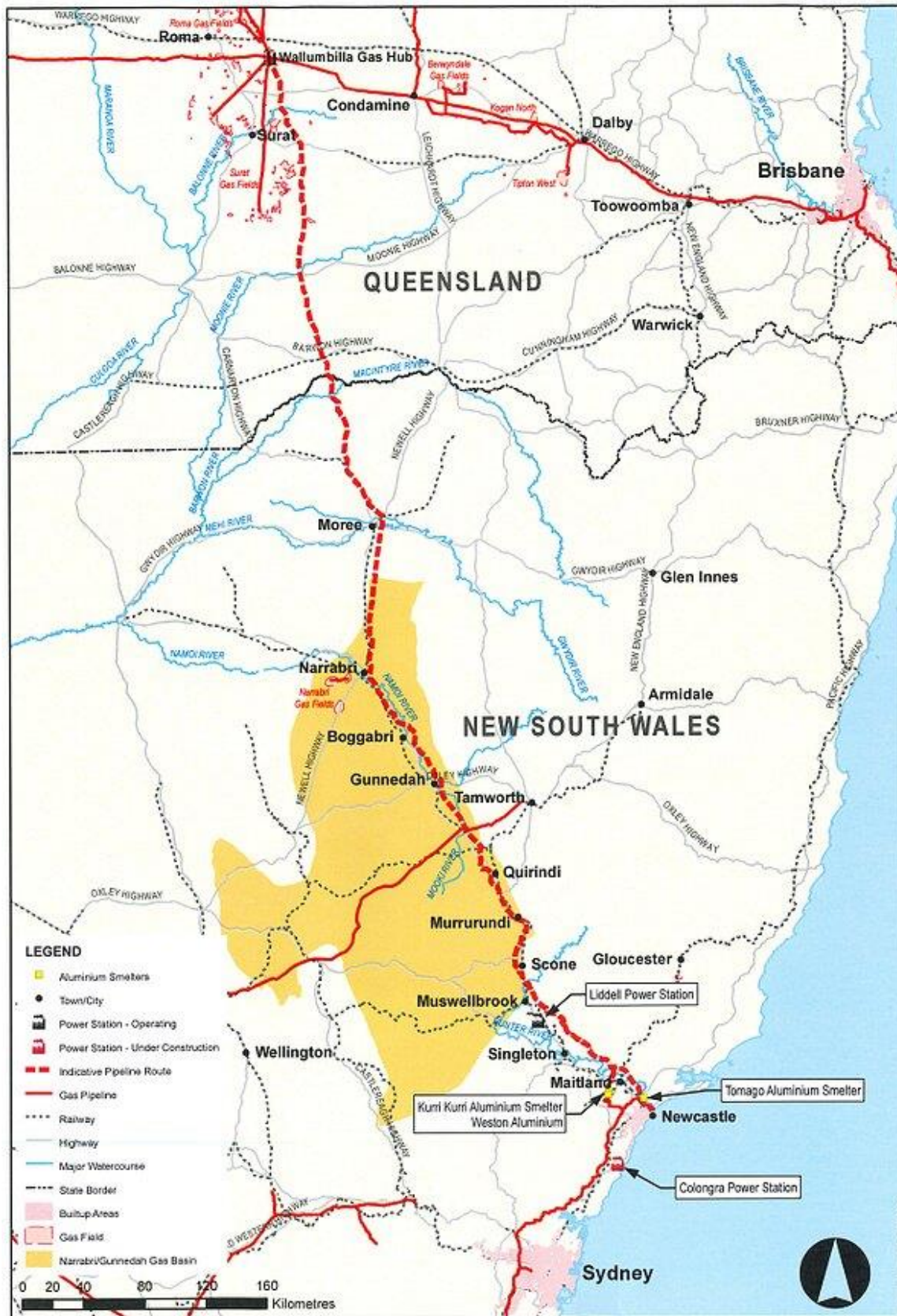
*The 833 kilometre pipeline is designed with offtake points at regional towns along the route, as well as the Hunter Valley, Newcastle and the Domestic NSW Market, including the Sydney Basin via Newcastle. The pipeline also has capability to supply gas to the regional areas of Dubbo and Tamworth via the Central Ranges gas pipeline.*

*HGP will be designed and constructed in accordance with the Australian Standard AS2885-2008 Pipeline- Gas and Liquid Petroleum.*

*The corridor was selected to ensure minimum impact on communities, landowners and the environment.*

*It is anticipated that the HGP will provide 350 construction jobs and 20 operational and maintenance jobs. Investment cost is estimated to be \$1.2 billion.*

*The HGP will secure the gas and electricity future of NSW households and businesses by securely delivering competitively priced gas for manufacturing, heating and electricity generation during peak load periods.*



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