I OBJECT to the Narrabri Gas Project

Dear Independent Planning Commission,

I object to the proposed Narrabri Gas Project due to its significant environmental, heritage, social and economic impacts.

I am concerned about the proposed gas wells in The Pilliga and surrounding farmland for many reasons. It is uneconomic, there are sacred indigenous sites that have not been considered, water and surrounding farms impact has not been sufficiently been addressed nor has waste.

The Pilliga is home to NSW’s largest temperate forest and is a highly significant area in terms of the state’s biodiversity. The Pilliga scrub is the largest continuous remnant of semi-arid woodland and is home to many threatened animal and plant species such as the Pilliga Mouse, Black-striped Wallaby and South-eastern Long-eared bat. This project will threaten their existence.

There are known to be four small colonies of koalas in the area, two of the close to the exploratory area in the Pilliga. If left alone, they have a chance of meeting up and breeding, they will not if this goes ahead. They are in danger of extinction in the wild, and all efforts should be directed at protecting their habitat if we are to save them. The world loves koalas and they generate 3,2 billion dollars of revenue and have created 30000 jobs. We need to keep this temperate forest safe for the future of our wildlife.

The indirect impacts of this project have been grossly underestimated by Santos. Several threatened fauna species will be disproportionately impacted by indirect means which have not been accounted for. The increase in feral predator activity in the gas field that will result from internal fragmentation cannot be offset. Bushfire risk will increase.

According to former Fire and Rescue NSW Commissioner Greg Mullins, the Pilliga could burn explosively due to the nature of its vegetation, and the gas project would not only increase the risk of fires starting, but to firefighters on the ground.

He said firefighting in the region depended on RFS volunteers, many of whom objected to the proposal, and some of whom might be unwilling to risk their lives in its defence.

"As you have heard from scientific, economic and engineering experts already, project approval should be denied on the basis that it will contribute directly and indirectly to increasing threats to life, property and our increasingly fragile environment," Mr Mullins said.

Satellite data is showing increased amounts of methane being released into the atmosphere, exacerbating climate change. The land is becoming increasing flammable and adding mining activities can lead to more ignitions.

According to other experts speaking at the commission Hydrologist Dr Keven Haley told the commission he did not believe Santos had conducted enough research to support its claim that groundwater would not be damaged, while Associate Professor Matthew Currell from RMIT said the Pilliga region had unusually rich and clean aquifers that had already been stressed by the drought and could be damaged by drilling.

The Bohena Creek GDE – Groundwater Dependent Ecosystem- at Narrabri is a High Priority Ecosystem and should be identified as such.

* Stygofauna GDE environment research indicates that surface & sub-surface environments are of high condition.
* Rarity within catchment and/or hydrological unit. Bohena Creek’s threatened ecological communities listed under the Threatened Species Conservation Act 1995 include White Box, Yellow Box, Red Gum Woodland; Fuzzy Box Woodland and Semi-Evergreen Vine Thicket.
* Existing diversity within catchment and/or hydrological unit. The surface ecosystem contains a relatively high diversity of plant and associated fauna species including the sub-surface environment have 11 stygofauna species recorded.

Santos has key deficiencies in their Aquatic Ecology Assessment.

The Independent Expert Scientific Committee IESC and other independent reviewers of the Narrabri Gas Project EIS have reviews that have exposed the failure of the NSW development assessment process to take into consideration groundwater ecosystems.

* The aquatic ecology of Bohena creek is not generally in poor condition as claimed in the EIS. Most parts of the creek are in a good condition.
* Hydrology modelling on impacts of treated water ignores the fact surface flow can be trapped in creek features. Why has no assessment been taken on impacts of toxins within water holes?
* Stygofauna survey was conducted by Santos’ consultants to minimise the chances of obtaining results. Independent surveys by Stygoecologia discovered relatively diverse stygofauna (11 taxa).
* Invertebrate surveys have been poorly done with no sampling from good condition waterholes. The survey missed a key species which are strong indicators of good health and permanence of the waterholes; that provide refuge for the native aquatic ecology which rely on good water quality.
* Santos contradicts the GDE atlas by which identifies the Bohena creek as a GDE ‘Moderatle dependent on surface expressions of groundwater’.
* Overall GDE assessments are poorly undertaken & should be rejected by state & commonwealth consent authorities as insufficient in detail & lacking in due diligence.

Santos' environmental impact statement (EIS) for Narrabri gas project cannot be trusted as it is missing analysis and contains conflicting information. There are basic scientific gaps with not enough monitoring wells in shallow aquifers or baseline chemistry data to get a good picture of groundwater chemistry and levels of key CSG-related contaminants.

Moree Aboriginal elder and Native Title Applicant for the Gomeroi Nation Polly Cutmore is also opposed as there has been no consultation with the traditional owners of the land. They do not want to hand the Great Artesian Basin over to Santos and with good reason, as with one accident and the Great Artesian Basin is ruined for life, this is a 20 year project. There is concern about the run-off waste into the groundwater and the poisoning of the waterways. Santos’ past record has not been good with multiple spills, and one area still unable to be rehabilitated in Queensland, and methane bubbling from the Condobolin river.

Professor Stuart Khan of the University of NSW said the project was likely to produce a mountain of salt in extracted water equivalent to the mass of steel in 17 Sydney Harbour bridges, and if it was dumped in landfill as planned, the salt would dissolve and need processing and removal.

Santos has still not given a suitable solution for this, which should have been stated up front on how to dispose of this waste.

In 2017 Santos had finally lodged its EIS for the Narrabri Gas Project, it failed to provide the NSW Planning Department with some required information, particularly regarding waste, after receiving 22700 objections, they produced their response and again omitted waste disposal plans. Now in 2020, the NSW Planning Department’s Assessment Report describes the Narrabri Gas Project as approvable? Despite still no details on how they are going to dump huge quantities of salt waste at landfills close to the project area. The latest suggestion from Santos was to enter into a MOU with a US company, no completion date, and not formalised.

This needs to be examined in depth as the unsustainable volumes of waste with no tried and tested treatment or disposal pathway, this should be enough to reject this project on it’s own.

The economics of the Narrabri Project does not make sense. There is a massive global glut in gas supply that will extend into late his decade. Despite the glut gas prices have remained high because Santos and others had failed to properly assess production costs. And now after COVID-19 has triggered falls in energy consumption and which has flow on effects on gas prices, Santos was forced to write down the value of its investments in the Gladstone LNG project on Tuesday 21st July. Investor advocacy group the Australasian Centre for Corporate Responsibility said that the write-downs are some of the clearest indications that fossil fuel assets are starting to become stranded. “Today’s writedown by Santos – on the back of Royal Dutch Shell, Woodside and Origin writedowns – is a clear demonstration that oil and gas assets are being stranded right now,” ACCR director for climate and environment Dan Gocher said. “Santos is prepared to sacrifice the climate and local communities on the slim chance that the Narrabri gas field may be profitable in the hope that business conditions improve. These gas assets will eventually be stranded. Santos must see the writing on the wall and abandon the Narrabri project before burning any more shareholder capital.”

It is a powerful indication of the amount of financial resources that have been lost by the oil and gas industry during the Covid-19 triggered economic crisis, and how much of a drag the sector has been on the Australian economy, rather than a contributor to recovery. The Narrabri Project will not bring down gas prices, as the price to produce it is too expensive. Now more than ever we should be investing in clean energy, not dirty, expensive old technologies like gas that put our climate, nature and our future under threat.

In relation to the claim that Santos makes stating that gas used for electricity generation is a clean transitional fuel. This is not so. According to a recently published report by North West Protection Advocacy (NWPA) used close to 1,000 gas sample points from wells in the proposed 850 gas well area and concluded that the average reported CO2 content in CSG for the project is 25%-30% in coal seams targeted by Santos.

According to the Environmental Impact Assessment for Narrabri gas, this CO2 would be extracted from the CSG and simply vented into the atmosphere, resulting in annual greenhouse gas (GHG) emissions estimated by the NWPA report to be nearly 1.7 million tonnes of CO2. This would considerably increase the carbon footprint of the Narrabri project which flies directly in contravention with our pledge to the Paris Agreement to reduce emissions by 26 to 28 per cent by 2030.

This area must be preserved. Santos has a bad reputation for ‘accidents’ and just one small accident could destroy the Great Artesian Basin forever, this cannot be remediated. Our farmland will be impacted. Look to Queensland and what has happened on their farms and look at the US farms on gasfields. Narrabri has a 1 billion pa economy, which will be destroyed if this goes ahead. Our farmland and clean water is more important to our future generations than gas. Once it is gone how are we going to feed the nation? What are we going to do for water if the Great Artesian Basin is impacted? More habitat and threatened species will be impacted including the koala. And again our First Nations people, the Gomeroi who oppose this, will again lose their history and sacred sites. And they are concerned with good reason about the Great Artesian Basin.

Please check the following link on the Pilliga to see what is at risk if this goes ahead.

[Living Pilliga](https://www.youtube.com/watch?v=bvQ3IGU7fBI)

Any determination by the IPC should be informed by adequate evidence and take a risk-based approach to prevent significant potential impacts to the region in determining whether this is in the public interest. With the hearings now complete, the IPC must consider community opposition and the evidence mounted by interest groups as to whether to approve the Narrabri Gas Project, when comparing with the significant economic, environmental and social costs it would bring about.

Summary of Narrabri Gasfield Risks

● Groundwater impacts including loss of bore water and surface water contamination
● Cumulative impacts from heavy industry in the region including existing coal mines
● Fugitive emissions
● Cultural heritage
● Established agricultural and tourism industry
● Public health and safety risks, including air emissions and exposure to toxic chemicals
● Bushfire risk
● Light pollution
● Biodiversity loss
● Social impacts
● Waste management
● Aquifer connectivity
● Inability of government to properly regulate the industry
● Chief Scientist Recommendations not implemented
● Spread to surrounding agricultural land
● Spread of invasive weeds

Due to the above reasons I strongly object to the Narrabri Gas Project.

Thank you for the opportunity to comment. I look forward to hearing from you regarding this submission.