



22 June 2020

Mr Mike Young
Executive Director
Energy and Resource Assessments
Department of Planning, Industry & Environment

via email: mike.young@planning.nsw.gov.au

Dear Mr Young,

Narrabri Gas Project (SSD-6456)

This letter relates to the above application which is currently before the Independent Planning Commission (**Commission**) for public hearing and determination. The Commission would be greatly assisted in its consideration of the application and the Department's Assessment Report by clarification of the matters outlined below.

Please note the list below is a preliminary list of matters. The Commission may seek clarification on other matters that may arise during the consideration of this project prior to the briefing.

Water

- The Water Expert Panel's consideration of the project in the context of the severe drought experienced since the 2017 EIS.
- The status of water sharing plans for the region under the Water Management Act 2000.
- The potential latitude afforded to the applicant by the Conditions – specifically by applying “generally consistent with” to annual & total water extraction caps, rather than setting absolute caps of 1.5GL/yr & 37.5GK total.

Hydraulic fracturing

- The arrangements in place to prevent Santos from using hydraulic fracturing in the event the project was approved.

Disposal/ Reuse of Salt

- Clarification of the revised salt volumes, likely management options, their potential impacts and the intended post-approval process.

Gas price impacts

- Further detail as to how the project will “*put downward pressure on gas prices*”.

Domestic supply commitment

- The arrangements in place to implement the statement that “*Santos has committed to providing all this gas to the domestic market and agreed to accept a condition to this effect on any petroleum production lease granted for the project under the Petroleum (Onshore) Act 1991*”.



Financial assurance

- How the Department will ensure that the reference to “*financial insurance/assurance to manage any residual risks during operations and following the closure of the gas field*” is implemented.

Technical Advisory Groups

- The intended functioning of the expert advisory groups proposed to be established under the recommended conditions.

Regulation

- The role of the EPA with respect to compliance and enforcement of the recommended conditions.
- The expected timing of the proposed Well Integrity Code review.

Recommended Conditions

- Overview of how key concerns are addressed in the recommended conditions.
- How the Recommendations of the NSW Chief Scientist and Engineers Review (2014) have been addressed in the conditions.

The Commission would be grateful if the Department could address these matters at its meeting with the Commission on 25 June 2020.

If you have any questions, I have asked Ms Casey Joshua, casey.joshua@ipcn.nsw.gov.au or (02) 8289 6913, to liaise directly with you.

Yours sincerely,

Troy Deighton
Acting Executive Director