

**From:** [Robert Irvine](#)  
**To:** [IPCN Enquiries Mailbox](#)  
**Subject:** Submission to IPPC on the Proposed Narrabri Gas Project SSD 6367  
**Date:** Wednesday, 29 July 2020 5:06:14 PM

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I write to notify IPPC of my strong objection to the Narrabri Gas Project.

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I am a regular visitor to the Narrabri and Pilliga Forest area and am aware of the rich environmental, agricultural, social and heritage values of the area.

I am deeply concerned at the Santos Gas Project proposal and saddened that the NSWG sees fit to support it. The proposal is not needed for energy security; it is very likely to cause significant harm to natural resources, ecosystem services, the environment and biodiversity; and, it is very likely to degrade the cultural heritage and community amenity of the area. It is not in the public interest.

It is beyond my capacity to provide a detailed submission. I have read and endorse the submission made to IPPC by the Sydney Environment Institute.

I commend their submission and call upon IPPC to consider it carefully.

Submission to The Independent Planning Commission on the Proposed Narrabri Gas Project SSD 6367, Sydney Environment Institute, 23 July 2020, Ms. Michelle St Anne, Deputy Director.

The Proposed Narrabri Gas Project SSD 6367:

Is not critical for energy security and reliability in NSW;

Is highly likely to have significant impacts on the region's significant water resources, including the Great Artesian Basin, the biodiversity and heritage values of the Pilliga State Forest, and the health and safety of the local community; and

Is highly likely to have significant impacts on people and the environment.

First, the NGP will not provide energy security and reliability in NSW because it will not provide essential gas supplies to the domestic market to address forecast shortfalls from 2024. The DPIE cannot rely on the project providing increased domestic gas supply as Santos has no corporate or financial motivation to do so, and there is no legally binding agreement or enabling legislation requiring it. Santos forecast for lower gas prices in no way reflects current economic and political realities, and there is already sufficient gas in the Eastern Gas Market to supply NSW needs.

Second, the proposed Narrabri Gas Project will result in significant risk to high quality groundwater resources in a region dependent on them. The proposed gas project involves extensive drilling below the Great Artesian Basin, creating a major risk of groundwater, land, and surface

water contamination. Despite Santos and the DPIE assumptions that risk will be minimal, new research demonstrates how methane contamination of groundwater occurs due to changes in pressures during water and gas extraction. This creates health and safety risks and compromises water quality. Wastewater has already leaked in the proposed project area during pilot exploration and production activities, which is of significant concern and demonstrates the high risks of the proposed project. The DPIE's assessment is not robust in relation to threats to the water table and management of waste brine, and its approval of adaptive management approach is insufficient to address significant potential impacts that are highly complex and therefore likely impossible to mitigate.

Third, concerns around social impacts presented by affected community members have not been adequately addressed by DPIE and Santos. The DPIE's assessment report relies almost exclusively on a desktop review by Professor Deanna Kemp of Santos' own Social Impact Assessment (SIA) and takes the view that Professor Kemp's review constitutes support of the project. Yet Professor Kemp has since clarified that her advice has been seriously misconstrued by DPIE and should not in any way be interpreted as giving the project "a green light". Further, no independent SIA has been undertaken and DPIE's reliance on Santos' numerous proposed but unwritten management plans, including a Social Impact Management Plan, is misguided, given that no actual assessment of the social impacts has been made by DPIE. There is sufficient evidence to suggest that the social impacts in the short and long term will be unmanageable.

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