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**To:** [IPCN Enquiries Mailbox](#)  
**Subject:** Narrabri Gas Project  
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Office of the Independent Planning Commission NSW  
Level 3, 201 Elizabeth Street  
SYDNEY NSW 2000

RE Narrabri Gas Project

Dear Sir

I wish to lodge a submission in support of the above development by Santos. I am not associated with any company group or association and hold no degrees in the sciences associated with the proposed development but I believe that I can speak with some relevance.

I retired as a lawyer some four years ago having practiced law in Narrabri since 1966. During the latter years of my practice I was extensively involved in water issues in the Namoi Valley and I believe I can speak with some authority on the subject.

I have always considered myself to be an environmentalist. During the 1970s and 1980s I accompanied the later Harry Buttler on studies of fauna and flora in the top half of Western Australia the Northern Territory and Christmas Island. I have taken a keen interest in the environment ever since. In addition to the above I have had considerable experience in local government law and the distribution and supply of electrical energy having acted as the lawyer for the old Narrabri Municipal Council and old Namoi Shire Council as well as the amalgamation of the two councils into the Narrabri Shire Council. I also acted as the lawyer for the old Namoi Valley County Council until the Government abolished County Councils in 1995. I have maintained an interest in the production, transmission and retail supply of electricity ever since as it is my hope that both State and Federal Governments might eventually formulate a policy whereby we can sensibly transition to renewable energy. Whatever the renewable source it will never produce enough energy to meet our demands and the demands of an ever increasing population. We will need a base supply and gas will be the least harmful to our environment.

I recall drillings for gas in the late 1960s and 1970s in the proposed area and later drillings by Eastern Star Gas. In fact I had several discussions with the general manager on the method of extraction ( fracking ). My observation of the community mood at the time was one of acceptance and hope of further development. No one at that time was aware of the significance of fracking. The project failed for a number of reasons but partly because of lack of funds, the coal seam bed was not suitable for fracking and difficulties in complying with environmental issues. Eastern Star Gas was responsible for the chemical spills for which Santos later had to accept liability in a later prosecution.

As you are aware Santos later took over the project but it proposed a different method of gas extraction which was not fracking and did not involve the infusion of chemicals into the coal seam bed. At about that time or shortly thereafter various groups were formed to oppose the fracking of coal seams. Gas protests were conducted gaining radio and television coverage. Even though Santos and those supporting Santos pointed out that it did not intend to frack nevertheless the opponents to the gas project still protested on the basis that Santos would frack for gas. Even media outlets were comparing fracking in the Queensland basin and America to the Narrabri project.

It was at about this time that one or more protest groups decided to conduct a survey in Narrabri about the Santos project but it was done with the general population being under the misapprehension that Santos would be fracking. I listened to some of the submissions televised recently at your enquiry and even at that hearing some objectors referred to " fracking " so presumably they believe that Santos proposes to frack for gas.

I reiterate that it is my belief that at the time the so called Narrabri survey was undertaken the majority of those who participated did so in the belief that Santos would frack. This may apply to other so called surveys conducted in the area. In 2017 the Department of Planning & Environment called for the Western Slopes Pipeline Community Committee to be established to look into the construction of a gas pipe line by the APA Group from the Santos site to connect up with the Moomba Sydney pipe line. I applied to be appointed to the committee in an effort to hopefully put a balance to the misinformation being circulated to the public and people in the Coonamble area. I was duly appointed and served on that committee.

As a lawyer involved with water issues I was familiar with the Artesian Basin.

The Santos site is one of many recharge areas along the one thousand kilometre or more perimeter. The flow rate of the underground water in the basin is between 1 and 5 meters per year. The direct distance between Narrabri and Coonamble is a little over 150 kilometres. It is a simple calculation to calculate how long it would take any water impurities to travel from the Santos site to Coonamble assuming that there was a leakage. At 4 meters per year it would take 37,500 years. At say half ( between 1 and 5 ) that is 2.5 meters per year, it would take 60,000 years. Not only that the direction flow from the Santos site is not towards Coonamble but North of Coonamble.

It is my submission that the concerns of the Coonamble residents are not based on scientific facts and should be largely discounted.

I made a deliberate decision not to make a verbal submission at the public hearing for fear of being " targeted " I was not even proposing to make a written submission until hearing some of the submissions made at the televised hearing which

alarmed me.

In relation to targeting by way of illustration the chairman of the Western Slopes Pipeline Community Committee committee was aware that some members of our committee would be targeted when one of the meetings was held at Coonamble. Owing to the number of protesters he arranged for the local police to be on standby and for security guards to be present to enable us to safely leave. Even though I am now retired I am still reluctant to make this submission however I feel that it is important that the Enquiry hear that the majority of people that I come into contact with in Narrabri are in favour of the project. I can say from a professional point of view over the years that I have acted for business men who have made a public stand or made decisions as councillors the result being that their businesses are targeted with resultant written and verbal abuse and financial loss. My own father who was a solicitor in Bogabri served as the Shire President of the old Namoi Shire Council and later the Narrabri Shire Council found that his business suffered as a result of the same problems.

I believe that targeting is one of the reasons that people are reluctant to come forward to express a view in favour of the project . It is much safer not to publicly take sides.

It goes without saying we need industries and employment particularly in light of the devastation caused by coronavirus and recent drought. I support the submissions made to you on the benefits associated with gas as an energy source.

In summing up I think all of the submissions put to your enquiry need to be put into perspective. A simple analogy: Fill a bath tub full of water, drop in one frozen pea; what is the difference in the levels?

Alan Finkel Australia's Chief Scientist has made a balanced and considered assessment in favour of the project and I and the majority of the people I come into contact with support his recommendations. I therefore urge you to recommend that the project proceed.

HughPalmer  
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Dated 1ST August 2020.