

## Make the conditions of consent unequivocal: submission in opposition

Notwithstanding that you should not approve the Narrabri Gas Project, if you do bow to political pressure and approve this pernicious, environmentally damaging and unnecessary proposal then please find a way to make the conditions of consent stringent to address all key concerns raised by objectors including climate change and GHG, fire risk, noise, water quality, damage to the Great Artesian Basin, geological fracturing, contamination of the shallow aquifers and adjacent streams.

The draft conditions of consent are loosely worded and give too much latitude to the proponent with little or no protection to the environment and the local and global community.

May I suggest that if you find this project approvable then amend the conditions of consent to close the loopholes and tighten the escape clauses as follows:

- Remove all the vague and subjective language (reasonable, feasible, practicable etc)
- Shorten the time frame to 20 years with no extensions (in-line with AEMO expectations for a transition to renewables)
- Cap the maximum number of new drill holes to 850 whether they produce gas or not
- Set a maximum threshold for the allowable percentage (~5%) of carbon dioxide in the gas in keeping with lowest possible carbon emissions
- No fracking now or in the future
- Set a strict regime for allowing and monitoring flaring and venting
- Stipulate that a wastewater management plan approved by IPC and the EPA with the necessary infrastructure is on-site and operational **before** phase 1 begins
- The outstanding management reports to be approved by the IPC in conjunction with the relevant government agencies before the DA is issued
- Extend the buffer zones around sensitive receivers
- Extend the buffer zones around water resources
- No discharges of any kind to existing water resources, streams or creeks
- Extend buffer zones around identified aboriginal and cultural heritage sites
- No future project modifications allowed
- Santos to relinquish all other exploration licences in NSW
- No further development of CSG mining in NSW

- Gas to be sold only within NSW at a discount to market prices
- A clause which clearly defines the conditions under which mining operations are stopped and DA and licences revoked (geological fracturing, contamination of groundwater, repeated breaches etc)
- Stipulate that the gas regulator invokes maximum penalties for breaches
- All mining operations to be audited twice a year against the conditions of consent by suitable qualified independent experts including a compliance audit of any and all monitoring data

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