

Office of the Independent Planning Commission NSW
Level 3, 201 Elizabeth Street
SYDNEY NSW 2000

7th August 2020

Written Submission: Narrabri Gas Project, Commission Public Hearing

Concern that the Project will not meet/achieve stated CO2 tonnes emitted/kwhr power generated

While clean natural gas is acknowledged to be a generally cleaner and more greenhouse friendly fuel for power generation, as opposed to (say) coal (on a tonnes of CO2 emitted per kwhr power generated), the difference becomes moot as the native CO2 content of any such derived CSG increases. Any native CO2 is simply vented to the atmosphere under current practices (and would be in the current proposal).

At the present time, given the information in the public domain about native CO2 levels in CSG gas in the Narrabri area, it is difficult to reliably compare likely native CO2 levels against the assertions currently made by Santos, and by David Kitto [DPIE], to claim that the carbon dioxide content of all the gas in the Narrabri Gas Project area is only 5%.

Specifically the assertion contained in the DPIE Final Assessment Report, that: "There are known to be some high-CO2 wells in the Gunnedah Basin, but overall, there is little publicly available information on CO2 in the NGP area". This statement is challenged given that there are some 40 wells with composition data in EPL238 on the DIGS database system.

As a professional in the area of subsurface development (having worked on both LNG and CSG projects), I consider that any claim as to the clean nature of the Narrabri CSG project needs to be further assessed and validated. This conclusion is driven by the sheer weight of local well data that provides for native CO2 levels in local CSG gas seams being much higher than claimed by the project proponents. The existence of this data needs to be acknowledged and any differences to that stated by the project requires up-front resolution.

Consequently, I consider it premature to consider a Project development decision be made today until these assertions can be properly evaluated. What is required is an independent assessment of both the available public data and the Santos datasets of likely native (or wellstream) CO2 levels of the CSG to be produced. The finding of this independent report should be made publically available.

The risk of not doing this validation now is to potentially approve what turns out to be a 'dirty CO2 project', namely one whose emissions of; tonnes CO2 emitted/kwhr power generated, falls outside any prior stated target. With local data suggesting conservative estimates of native CSG levels of 20-25% CO2 (mole basis) then this risk is considered high at the present time. If project approval requires this target to be met, then more due diligence needs to be done.

Sincerely

Dr Ian Taggart

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