From:	Peter Wills
To:	IPCN Enquiries Mailbox
Subject:	Private submission of objection
Date:	Sunday, 9 August 2020 7:36:25 PM
Attachments:	Peter Wills Santos Written sub.pdf

I object to Coal Seam Gas development in NSW, I object to the Santos Narrabri Gas project in my region of Northwest NSW, and I most strongly object to potentially being forced by the State of NSW to take onto my family farm the Queensland Hunter Gas pipeline that is approved over our property against my wishes. I ask the commissioners to listen to the clear opposition voiced to the IPC.

I have uploaded this my private submission and pdf detail, I am emailing here to ensure it has been received by the IPC, in time for tomorrows 5pm deadline.

Regards
Peter Wills
1 Moffatt St, Breeza, NSW, 2381

I write in the most strong opposition and objection to the Santos Narrabri Gas project as a local to the North west region of NSW.

I live in Breeza NSW (approx 130 klm's from the project area), and my family farms are based at Quirindi NSW.

We are a neighbour on one family property to Whitehaven's Werris Creek coal mine, and this same property is a potential host for the Queensland Hunter Gas pipeline via their approved pipeline *corridor*. The owner of this pipeline *corridor* Hunter Gas is in talks with Santos for use of their approved pipeline *corridor* for evacuation of the Narrabri project gas to the east coast.

Our family home and cropping property has been earmarked for gas exploration as we are in PEL 1. We have had requests from coal seam gas explorers wishing to explore on that property which was strongly refused when the informal phone call was received – over a decade ago now.

I spoke at the Narrabri Gas project hearings about the risks of the Queensland Hunter Gas pipeline and concerns I have over this *corridor* will be addressed in a submission from my local action group committee *Concerned Residents Against (the Queensland Hunter Gas) Pipeline – C.R.A.P.*

I have followed much of the IPC public hearings over the 7 days and wish to strongly refute and argue David Kitto and the Department of Planning's many claims in regards to potential water loss and "burden of proof" – in relation to the Santos project.

I will be highlighting here how the Departments assurances are in no way any comfort to myself and I would suggest the broader community. In fact they stoke a strong level of fear that these assurances have been made in relation to the Narrabri Gas project – as I don't believe there is any integrity to the comments made, as they don't represent experience held by the community in relations to the Whitehaven Werris Creek Coal mine's potential aquifer interference with neighbour's right alongside in the *'Quipolly water zone'* that has experienced an unprecedented amount of water issues, both stock and domestic bores, and for small scale irrigation, in the subsequent years since that mines major development.

I thank the Commissioners for bringing the Department of Planning back for additional comment and questioning by the panel.

Extracts following capturing the Department of Planning's comments of Mr David Kitto and Mr Mike Young are from the IPC Narrabri Gas project transcripts from Day 7 of the Commissions hearings, being the 1st August 2020.

- ***David Kitto: "The second point is that, you know, any impact on those bores is avoidable and reversible in the sense that, you know, what we're requiring in the conditions – and, you know, there will be additional monitoring by government – is that there will be monitoring being undertaken in all the Strata's between the coal seam and the shallow aquifers where most of the bores are in the area and you would pick up any movement, you know, and drawdowns, and so on, long before any bores may be affected. So the issue is: you should be able to avoid – like if in the unlikely event that all the modelling is wrong and that, you know, some drawdown may occur, you would pick it up long before it happened and there are things that you can do to avoid that impact."***

Question: In regards the argument 'reversible' – what does this mean? If something catastrophic where to occur with aquifers higher / shallower were hypothetically to seep to newly extract 'empty' deeper aquifers – how is any of this 'reversible' if the lower seams, are a toxic space for water reserves.

Question: Is the taxpayer subsidising Santos and the Narrabri Gas project by offering Government monitoring for additional Santos monitoring that will be required by approval conditions on the Narrabri Gas project.

Question: There is licensed take, both accounted for and unaccounted for, on bores across NSW, and the non-accountability of Stock and domestic bores opens up the scope for allegations of heavy farmer / user take that is simply un-confirmable and an argument that has been used in the past by mining proponents to throw off allegations off their potential interference – as has the argument of 'drought' in regards to water depletion and aquifer recharge. Without full accountability there will always be 'doubt' and inconsistency's in the data monitoring.

- ***David Kitto: "So the critical issue there is really the key mitigation measure – and I'm not saying it's the only one – but the key mitigation measure would be to deepen – deepen the bore. And so this comes to, you know, some of the adaptive management measures in the plan, in the water management plan, and so on, where you do the monitoring and if monitoring is picking up early signals then you might take corrective action before it actually happens. So this is a bit different to some of the situations in coal mines, and so on, where the drivers, and so on, are quite different. So I think the likelihood of this being required is extremely or very, very low and there are things that can be done to avoid it and to mitigate against that impact."***

Question: Who pays to deepen the bore? What if a bore can't be deepened? This *"key mitigation measure"* is hardly a solution in immediate loss, or a medium to long term solution if new drilling doesn't secure new or additional water sources for the smaller stock and domestic use, or the larger take of irrigation usage. This loss of water can render property's in their production scope - from irrigation to dryland cropping use only, a severely detrimental blow in both the asset values and ongoing use, and larger scope issues to local regional economy's, at face value.

- ***David Kitto: "I think the – but to come to the question of council and the question you asked, in terms of baseline data, Santos has already collected a significant amount of baseline water data and most of that is included in their water baseline report and the conditions require them to collect a lot more ..... so, you know, a lot of that will be driven through the water management plan and through the field development plan."***

Question: Will this baseline data be fully publicly available in real time for transparency, analysis and scrutiny?

Question: How often is data read and these details delivered to the public domain, or do they deliver *averaged data* from a period of time?

- ***David Kitto: "Now, I think, you know, there are a lot of community concerned about the project and so, you know, we've had submissions from people from tens and hundreds of kilometres away that are worried about the effect on water bores, and so on, and there may be an expectation that monitoring will be done for every single one of those bores but there will be a focus on particular areas where, you know, the risk is."***

Question: The project has clearly defined that the Narrabri Gas project will drawdown upon and detrimentally affect the 'Gunnedah-Oxley Basin'. These users extend all the way to areas such as Spring Ridge NSW on the Liverpool Plains area, more than 100 klm's away from the project area. Depending on the depth and reliability of an individuals specific bore – why shouldn't they expect full monitoring of their basin that could have a direct effect on their ability to use their bores to their current full effect.

- ***David Kitto: "So I do think then, you know, people may – everyone may think there will be precise monitoring of their bore but it will be targeted to those areas – certain areas and it will be – and it will be intense and it will be ongoing. So the project might be rolled out over 20 years, 25 years, or if it goes ahead, and through the field development plans, and so on, there will clearly be targeted data collection in and around the areas where those wells will be drilled. There will also be data collected further ..... but it will be focused particularly on those areas."***

Question: If a *whole of* aquifer basin is to be potentially affected, there is an expectation of landholders that full a monitoring will and should occur. If you can't afford or desire to monitor the entire basin of which you are a water take user, you shouldn't develop a plan that will so detrimentally affect a *whole of* basin in your scope of development.

- ***David Kitto: "The second point I would make – like to make is that, you know, the risks of anything happening in the shallow aquifer, in terms of drawdown, are predicted to be many years into the future in potentially over 200 years and, over that period, you would expect to have a lot of data – you know, collected a lot of data that will provide a reasonable baseline and, as I said earlier, we have a lot of data about what's going on in the lower Strata that will then trigger any kind of trigger action response plan or adaptive management to make sure that nobody is compromised."***

Question: What are Santos or the Narrabri Gas projects obligations to monitor aquifer systems after their decommission / end of the project life. Is it in fact the State that is being tied to ongoing monitoring of the Santos project possible drawdown in perpetuity? What recourse does a water user have once Santos is gone?

- ***David Kitto: "Now, in terms of the burden of proof, you know, no one is expecting landowners to have to prove their water has been adversely affected by the project. You know, it is – the conditions really require Santos to get a comprehensive baseline of anyone who might be affected and whether, you know, that might be a sample – detailed sample. But there will be extensive monitoring going on and it's not – it will not be up to the landowners to have to fight the case on their own. It really will be the responsibility of government to oversee that and to make sure that, you know, if, in the unlikely event it occurs, that simple measures are in place either to avoid it or, if that's not done in time, then to require corrective measures to either deal with the bore or provide a compensatory supply.***

Question: Those areas that are not being monitored, what options do they have to recourse, is it as simple as your not being monitored, so you can't possibly be affected by this project - and then your again on your own as landholders to fight for reasons as to why you may have water loss or depletion?

Question: "responsibility of government" What does this mean? Who is responsible for the *"corrective measures"* of water loss, the Government or the proponent?

Question: The comments made by Mr Kitto in his representation of the Department of Planning to the Narrabri Gas project Commissioners do not come from a place of reality or experience from this Department. I question the ability of the Department responsible to actually execute this statement into a scope of works that has any relevance to water users, in a timely manner in relation to their ongoing existence on their own properties.

- ***Mike Young: "David, it's Mike Young here. In terms of timing, my understanding – and, certainly, the way we've conditioned these matters elsewhere in New South Wales – is that we would expect – once there's an indication that the data indicates there is an issue, in that unlikely event, that there may be a longer term solution to addressing that shortfall in yield or water supply for that particular landowner but we would expect, as part of the protocols under the management plans, for Santos to put in place very short-term mechanisms to supply water to that landowner to ensure that, you know, their immediate needs are met in terms of stock and domestic, and so forth, and obviously, in this case, Santos would have a range of water supply ability, in terms of ..... from the project, and elsewhere, that it could easily provide to that landowner in, you know, quite a short period of time."***

Question: This is not a statement that can be applied into the lived experience for the neighbours of Whitehaven Werris Creek coal mine. The local water users experienced water loss, and there was no compensatory water supply offered from the nearby proponent miner. A lack of water monitoring and baseline data simply meant no one but the detrimentally affected water user was then responsible for rectifying the loss of water in their bores. Proportional blame could not be identified due to lack of baseline data. No one could be proved guilty and in turn no one could be proved innocent in the community perception of causation of the losses.

I would like to direct many of these arguments made from the DPIE to the IPC on August 1st 2020, towards the community experience at Quirindi, in the small Quipolly water users basin that sits alongside the Whitehaven Werris Creek Coal mine:

Water users in the *Quipolly aquifer basin zone* a small area near to Quirindi NSW and alongside to the Whitehaven owned Werris Creek coal mine, have experienced enormous issues over the last 5 years and more, rendering the water licence holders an almost valueless asset in terms of their ownerships of stock and domestic and irrigation licences, with severe water loss and depletion across the area.

Suspicion has been directed at the possible interference of the Werris Creek mine that over the same period experienced the opposite problem to the neighbours, with excess *seepage* of water into their coal mine pit – a pit site lower than that of the water table, and they have had to modify their water management plans to develop extra water holding dams/ponds.

Additional methods of 'getting rid' of excess water was developed by the mine including evaporative sprayers that often ran upto 24hrs a day to rid themselves of water, whilst many irrigation farms and stock and domestic supply's in the area suddenly seemed to have diminishment and major drawdown issues in their bores.

Whitehaven Coal at their Werris Creek mine site even set up an irrigation development on land they own for cropping production to use this additional and unexpected amount of water onsite that had not been forecast nor expected in relation to their EIS development, this was alongside to farmers paddocks who could no longer irrigate, and were forced to move to dryland cropping operations.

The Quipolly water users have in fact been absolutely abandoned in the scope of "burden of proof", rectification of bores and immediate compensatory replacement for loss of water, and "responsibility of government" both at a State and Federal level has been at best to ignore the issue. There has been plenty of work on-the-ground from local water users to seek out answers from the Department of Planning, Mr Kitto, Young and O'Donoghue to understand what steps are now required to understand what has perhaps gone wrong here in the Quipolly water zone, with "burden of proof' and "responsibility of government" very lacking in support for the local affected landholders.

The amount of new water supply and drilling in the Quipolly basin, deeper into additional aquifer supply has been unprecedented over the last 5 years, and all at the landholder expense and at their own urgency to resupply water sources from previously reliable bore supplies.

I have attached just one piece of correspondence from the local water user community group, directed at the Department of Planning, highlighting years of research conducted within the community, funded by the community in search of answers to water loss and depletion. The "burden of proof" lay direct with the affected landholders in the region, not the neighbouring proponent, who in response to much action from the community has been forced to complete additional water monitoring in the immediate area. All this has taken place *after the fact* of water loss, with no rectification of water supply support given to the local community.

This has all been facilitated poorly by the Department of Planning, who have given absolutely hollow and deceitful assurances to the IPC Commissioners into the Santos Narrabri Gas project, in relation to the lived experience of this alleged departmental support to communities.

QUIPOLLY WATER ACTION GROUP INCORPORATED

5th February 2019

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Dear Alison

Re: Werris Creek Coal Mine

As you are aware we have raised our concerns about the Groundwater monitoring at the Whitehaven Werris Creek Coal Mine a number of times with you and your colleagues. We feel we have made some progress, for example the installation of the four dedicated monitoring bores installed July 2017, however there are still concerns by the community that more could be done to improve the situation at Quipolly.

We have never fully understood the technique used by WCC to monitor and report groundwater quantity. The technique used is cusum analysis. Last year QWAG Inc. wrote to the WCC Environmental Officer and asked for presentation on cusum analysis at a Community Consultative Committee Meeting. Ramboll Environ, WCC Environmental Consultants, conducted a presentation on cusum analysis at a CCC meeting which included a handout. This handout was passed on to QWAG. Due to the technical nature of the paper we commissioned a review by an independent hydrogeologist, Andrea Broughton.

Doug Anderson, UNSW WRL has also completed a review of a number of WCC documents including the Installation of Monitoring Wells (August 2017 Ramboll Environ), 2017 Independent Audit, 2016 Annual Environmental Management Report, Water Balance Modelling (November 2016 ARUP Pty Ltd) and the DPI Memorandum to DP&E regarding the Werris Creek Mine Site Water Balance Review.

These documents confirm what the Government Hydrogeologists identified back in 2015 that the groundwater monitoring at the Werris Creek mine is inadequate. We would like to provide these documents to you for the Government Hydrogeologist to review, consider the findings and prepare a response to the QWAG Inc. We insist that these documents are not provided to Whitehaven.

Is a review of the documents something that your Department would consider?

Yours sincerely

Sandra Ryan
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