

# Narrabri Gas Project

Thank you for the opportunity to make a submission to the IPC Hearing on the Narrabri Gas Project (NGP).

I am not an activist, I have no affiliation with any organisations. I am just a concerned Australian who has watched the NGP unfold. I have read the EIS in all its guises and the assessment report and cannot find any reasons why this proposal should be approved.

My understanding is that the Office of the Independent Planning Commission makes objective assessments of proposals by weighing their public versus private interests.

Public opinion is overwhelmingly against this proposal and the only support comes from short-sighted government and private vested interest.

I can find no merit in the proponent's EIS nor the Department's assessment report. I refute all the reasons why the Department considers the proposal to be in the public interest.

Australia already produces more gas than it needs and by doing so disperses polluting GHG across the world. This proposal is not a critical gas supply for NSW.

Nor is it in the public interest to build more polluting fossil fuel power stations. It would be more sensible to find ways of dispatching power from renewable energy sources. There are now a growing range of options for doing this. If you doubt this, then have a look at the recently released AEMO 2020 Integrated System Plan. Why is our government not exploring these options for the sake of Australia and our planet?

I would also like to know how one CSG mine will put downward pressure on gas prices. Demand for gas is reducing across the world right now and companies are moving away from CSG mining. Those factors will have a greater effect on prices than a single gas mine.

Closer to home, the economic benefits to NSW and the Narrabri region are questionable. The amounts of money going to the Shire Council, community benefits and royalties over the life of the gas mine are small change when measured against budgets and costs to build roads, schools, hospitals and other infrastructure.

Santos makes contradictory statements about the number of ongoing jobs, and their capacity to employ local people. Any gains will more than likely be offset by the jobs lost in agriculture when people move away or lose their precious water to drawdown and or contamination.

The proposed industrial hub in Narrabri may well be a real benefit to the local area but it is not contingent on a nearby CSG mine but would be better served by a renewables hub and a solar farm delivering electricity to the whole community.

I don't understand why the Department can say that the project has been designed to minimise impacts on water, biodiversity, heritage, health and safety when there is very little design and there are too many unknowns. We don't even know where the gas wells will be located or how the salt laden and possibly toxic wastewater will be disposed of safely.

And Santos after a decade of gas exploration in the Pilliga still hasn't provided hard data about the impacts of their proposal. It is not OK to approve a project contingent on drilling more exploration wells. I liken this to brain surgery without an MRI or a plan - keep drilling until we find something or the patient dies. Except it's not one life on the table but many lives now and in the future will be at stake if this proposal goes ahead.

Furthermore in the past 10 years there has been numerous pollution spills and contamination of groundwater in the Pilliga as a result of Santos' exploration. I'm sure these accidents were not deliberate so this is not about the proponent's conduct. It is all about risk. Santos' inability to properly manage less than 80 gas wells and to adequately rehabilitate pollution spills has set a disturbing precedent that must be considered in your assessment. Santos has a long history in gas mining and presumably follows best practice and yet has been unable to manage leakages and spills from a few wells and pipelines. The impacts of 850 wells are likely to compound the risks to unacceptably high levels particularly for a mine that is not needed. And we know from bitter experience that the damage will be irreversible.

The conditions of consent are so loosely worded that they are anything but strict and compliance with and enforcement of government legislation, standards and policies will be well nigh impossible.

I don't understand how residual impacts (whatever they might be) will be reduced by capping the yearly and total water extraction. This suggests to me that the Department does have unvoiced concerns about the impacts of extracting gas and water from the deep aquifer and the likely effect on the shallow aquifers.

Never mind that the water is likely to contain twice as much salt as originally thought and there is still no plan for its disposal.

There is one strict condition of consent - no fracking allowed. If after the DA and licences were issued, Santos did turn around and said that fracking was necessary to extract this State significant gas I'm sure they would get permission. So please don't factor the no fracking clause into your determination because we know that ongoing modifications to projects are par for the course and approvals virtually automatic. This also means that you must consider the domino effect if this mine is approved.

The Pilliga is so significant and unique that meaningful offsetting is simply not possible. No other land can be set aside to save the biodiversity of the Pilliga. When that flora and fauna are lost they will be gone forever.

Departmental experts said that the geology of the deeper aquifers was not well understood but felt that ongoing monitoring, adaptive management and rigorous enforcement of strict conditions of consent would reduce those uncertainties.

Santos has already had 10 years of testing and monitoring and appear to have learnt nothing, so ongoing monitoring will achieve nothing.

Adaptive management or learning by doing is a legitimate approach for managing something that already exists like say a river system, not a mine for goodness sake. In this case adaptive management is really a euphemism for a trial and error approach - let's drill a well here or a well there and too bad if something goes wrong. High risk indeed.

As I have already noted there are so many escape clauses in the conditions of consent that they will be unenforceable. And once a proposal is approved it cannot be stopped.

The Department has not adequately considered the advice of these experts and has recommended approval of a proposal which downplays the impacts, ignores the risks, overstates the benefits and which has been poorly assessed.

Every which way you look at it this is a high risk proposal to drill through OUR Great Artesian Basin for no benefit except profit - or should I say a tax write off since Santos currently pays no company tax.

The opposition to this proposal is overwhelming and comes from both the local and wider community concerned about the likely impacts and the domino effect of turning north western NSW into a gas field at this point in time when we must say no to fossil fuels.

This proposal is not in the public interest and must be refused.

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