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To: [IPCN Enquiries Mailbox](#)
Subject: OBJECTION TO THE NARRABRI GAS PROJECT
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Objection to Narrabri Gas Project

My name is Karl Geoffrey Petersson and I am a lawyer who has followed the Narrabri Gas Project closely since Santos began. I regularly follow the finance media. I have visited the Pilliga Forest and observed the physical location of the Narrabri Gas project in the largest inland forest of NSW.

I object to this project being approved for several reasons, but two reasons pressing on my mind include:

- 1. The GHG emissions are not properly disclosed, and the CO₂ content of the gas to be produced is deliberately mis-stated and**
- 2. Bushfire risks are not properly disclosed and are unacceptable.**

I wish to point out that I am not from the Narrabri area, however the matters of concern to me are matters affecting all residents of New South Wales. I reject the thinking that a project of State Significance with potential to damage the Great Artesian Basin is a matter in which a small group of businessmen in Narrabri should have greater say in. I reject the notion that only people with a Narrabri postcode are fit to influence the thinking of the Commission on the climate change impacts of the Narrabri Gas project, which from latest information published appears to have greenhouse gas emissions on par with coal for power generation. Dr Andrew Grogan's oral and written submissions set this out in detail referred to below.

The risk of denuding one of our vital carbon sinks and replacing it with a gas field of hundreds of active and retired, leaking gas wells with all of the associated infrastructure, is unacceptable to those of us who recognise that climate instability is a financial cost to the State and the Country.

Particular I wish to draw to the attention of the Commission some research that has been conducted by Dr Andrew Grogan, and now supported by Dr Ian Taggart of Newcastle University.

Both of these independent experts have presented evidence to the Commission to the effect that the Narrabri gas is excessively high in CO₂, closer to 25% gas composition and not 5% as claimed by Santos. This information has not received attention in the mainstream media.

It is certain that this CO₂ will be vented to the atmosphere, therefore this evidence suggests that Santos' GHG emissions are far greater than disclosed by the company.

Additionally, given the high CO₂, Santos' project justification including its estimate of how much methane gas can be extracted to contribute to NSW energy supply is no longer to be trusted.

If Narrabri gas is an average of 25-30% as estimated by Drs Grogan and Taggart using publicly

available data on the government's DIGs database, this blows apart Santos' GHG disclosures, which is sure to be of interest to shareholders and regulators, as I hope it will also be of concern to the Commission.

I also wish to question the bona fides of the Department of Planning Industry and the Environment which claims in its 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".

Given that there are some 40 wells and around 1,000 well completion records with composition data in EPL238 on the DIGS database system, operated and maintained by that very department, it is not correct to state there is little publicly available information.

It poses the real possibility that the DPIE has actively misled the IPC in this regard.

As Dr Grogan states: *"This calls into question the quality of the resource and the cost of developing it. Santos would need to extract and vent this CO₂ in order to meet user and NSW pipeline requirements, and resulting in large greenhouse gas emissions due to the vented carbon dioxide."*

Source:

<https://www.michaelwest.com.au/battle-for-narrabri-report-claims-santos-gas-field-emissions-approach-coal/>

The repercussions for parties knowingly presenting misleading evidence to the Commission must be sufficient to disincentivise others from doing so in the future. The Commission must call out this blatant error in the Assessment Report.

Following publication of the article "Battle for Narrabri: Report claims Santos gas field emissions approach coal", the Chairman of Santos came out at the Santos AGM and made new claims that Santos is not actually targeting the seams it said it would in its EIS. This statement does not appear to have been noticed by anyone in the public domain.

Dr Grogan has said in a subsequent article following the Santos AGM, that: *"If, as suggested by Mr Spence, Santos will not be producing from the Hoskissons seam, then the entire EIS will need to be resubmitted and Santos will need to reduce any reserves associated with the shallower Hoskissons seam."*

<https://www.michaelwest.com.au/cherry-picking-santos-selects-convenient-data-to-deflect-narrabri-gas-challenge/>

I ask the Commission to consider the submissions of Drs Grogan and Taggart very closely.

Bushfires

To the extent that I have been able to follow the progress of the hearing, I note that there has been some evidence presented to the Commissioners about the potential for gas flaring to be a bushfire risk. This was as a result of the NSW RFS submission requesting a ban on flaring during catastrophic bushfire conditions. I note that Santos has produced some modelling that suggests that no leaves could ever blow onto the flare, and carry flame elsewhere, and furthermore that there are other calculations they have made that preclude a bushfire risk, including evidence

from David Kitto from the Department that there are no willy-willies in that part of NSW. This blatant falsehood might be his opinion, but it is not fact. These mini-tornadoes are very common in the north west.

The levity with which Santos treats the bushfire risks is unacceptable.

Also, I do not believe that there has been adequate attention to other aspects of gasfield infrastructure that could introduce fire risks. This includes all other infrastructure which has the potential to leak methane and raise the ambient methane concentration in the atmosphere to a point where it could exacerbate bushfire risks. These include pipeline joins, high-point drains, low-point drains, compressors, etc, all of which are known to leak gas.

Thank you for your consideration.

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