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To: [IPCN Enquiries Mailbox](#)
Subject: Public comment on Narrabri Gas Project new material
Date: Tuesday, 18 August 2020 5:12:56 PM

Hi IPCN.

This is my response to the response. I continue to object to the proposal.

After reading through the information provided by the DPIE and Santos, it is clear they haven't really answered anything that the experts, scientists, community members and concerned people have asked or raised. The level of detail expected by everyone who submitted has fallen short of what we have asked for. So much so, that these poorly rushed submission responses have spelling mistakes, grammatical errors and even a section by the DPIE talking about waste on page 25 that ends mid-sentence! If this is the level of care and attention to detail from the DPIE then you have no other option to reject this proposal in the interests of NSW.

It also reads like they haven't given any real answers, and what statements they have made are very loose and open ended giving no certainty that they even know the answers.

Such as the waste disposal issues that were brought up by Professor Khan, still have not been answered by the DPIE, and only give answers that they will be dumped in a suitable place, without naming where because a/ they don't know or b/ there isn't any.

Areas such as the claim about the Govt responded to the 16 Chief Scientist recommendations do not meet community standards or expectations, and we believe they have not even come close to implementing them beyond 2.

With the Santos response submission, Santos barely engaged with the arguments, particularly on social impacts, biodiversity survey effort, offsetting and indirect impacts, merely reiterating what they have said previously.

Gas price, demand and project justification: On price, they attempt simultaneously two somewhat contradictory arguments: that Santos has been getting high contract (international) prices of A\$12/GJ this year despite the oil price collapse, but at the same time, that Narrabri will bring down gas prices in Sydney by between 4-12% over a decade, reducing to 3-9% if a chunk of the gas is take up by a local fertiliser factory.

Crucially, the price chart in ACIL Allen's model shows gas prices generally increasing over the next two decades and from 2030-40, staying above \$9/GJ with or without Narrabri. This is important because it contradicts the argument that closure of coal and "need" for gas power justifies the project. AEMO's recently released *Integrated Systems Plan 2020*, looking at future energy grid options, is very clear that gas prices would need to be as low as \$4/GJ after 2030 to be competitive with battery-supported renewable energy.

The need for the project as articulated by Santos is still fairly generic. The new ACIL Allen report, however, notes that "Gas Power Generation demand is likely to decline from 92 PJ/a in 2020 to 30PJ/a by 2028." They anticipate that it will rise again post 2030 when

more coal power stations close, but AEMO's analysis is pretty clear that this will only happen if the gas price is half or less than ACIL Allen's forecast. The [recent announcement by AGL](#) that they are scoping a plan to build grid-scale batteries to replace Liddell underscores this.

Climate change and transition: Santos glosses over the reality that gas is no longer just competing with coal: it is competing with renewable energy in both Australia and internationally. They claim to support limiting global temperature rise to less than 2 degrees C, but avoid articulating how the Narrabri gas project is consistent with that goal and don't engage at all with the information put forward by Prof Penny Sackett, for example, which puts Narrabri's greenhouse gas contribution in the context of Australia's greenhouse commitments and a carbon budget consistent with the 2 degree goal. Santos cites modelling for the *World Energy Outlook 2018* indicating that under its "Sustainable Development Scenario," global gas demand grows by 14 per cent by 2040 compared to 2016, but fails to mention that growth in gas demand since 2016 has **already exceeded this amount** and so the WEO 2018's Sustainable Development Scenario would see gas demand *contract* on 2018 levels by 3.4%. The WEO 2018 clearly states that "A three-way race is underway among coal, natural gas and renewables to provide power and heat to Asia's fast-growing economies."

Santos mentions Stage 1 of NSW's *Net Zero Plan*, but not its goal of introducing hydrogen as 10% of the gas in NSW's network. Instead they focus on the "Memorandum of Understanding – NSW Energy Package" signed between the state and Federal governments earlier this year. This MOU, as Santos identifies, set a (non-binding) target of adding 70 petajoules of gas per year into the NSW market, though Santos fails to mention two other potential projects, one of which already has development consent, were conceived in the MOU as potentially meeting this target.

Santos argues that the CO₂ content of produced gas is far lower than the CO₂ content of the gas underground because of different desorption rates. It appears that the information they claim to have that backs up this contention is still not being made available on the grounds of commercial confidentiality.

Insurance: Santos narrows this issue to public liability cover for landholders who actually host Santos' infrastructure. Most of the submitters who discussed insurance gaps were chiefly concerned about uninsured environmental harms in the public forest and affecting downstream water users.

Salt waste: Santos mischaracterises submissions on this issue. The problem is not that the Waste Classification Guidelines "do not apply" to salt, but that for solid waste that becomes liquid upon contact with water, application of those guidelines without further specifications and constraints creates the risk of serious and irreversible environmental harm, in the form of groundwater leaching. They cite some landfill design features that could mitigate this risk, but provide no information about whether landfills that have such features are available and willing to take the huge volumes of salt they will produce.

Water licences: In section 9.1 Santos presents information on "average volume traded" in various water sources since 2017 to support its contention it will easily be able to acquire the necessary water access licences, but this is misleading since it doesn't specify what type of water trading is covered. The NSW water market allows for temporary and permanent trades. To account for water take over several decades or centuries, a temporary trade would obviously not be appropriate. The IPC should follow up seeking information about permanent transfer trading or Water Access Licence trading in each of the affected water sources.

Gunnedah Oxley Basin water users: Santos' assurance that impacts of the project on these water users "can be adequately managed through monitoring and adaptive management as prescribed in the recommended conditions of consent which allow for early detection of drawdown effects in the Gunnedah Basin" are not credible given the on the advice from DPIE Water that Santos' proposed groundwater monitoring network in the GOB is not adequate to achieve this.

Groundwater: Santos insists that calibrating the groundwater model to Class 2 or 3

confidence “may, at best, take decades to achieve.” This is crucial to the IPC’s consideration of the precautionary principle, since the argument is essentially that the impact must be irreversibly inflicted on the groundwater hydrology of the area before it can be understood.

Santos acknowledges that GISERA’s groundwater modelling uncertainty analysis generated a range of water production volumes between 4.4 gigalitres and 107 gigalitres and that at the higher end of water removal, CSIRO estimated 2,299ML per year peak induced flux from the Pilliga Sandstone. They claim that two key parameters informed this higher rate of estimated take: greater proportion of exploitation of the Hoskissons seam than they intend, and greater take of water extraction than the conditions of consent allow. Regarding the Namoi alluvium and the discrepancy in the volume of flux assumed from the GAB recharge to the Namoi alluvium in the NA model and Santos' model is "insignificant" ... but if that's the case, why didn't they just use the existing model's figure for this parameter?

There’s a complicated refutation of the science behind the Iverach paper which I understand will be responded to by people who understand it.

Spills: The company claims that “in Queensland, no regulatory enforcement action has been required in a period where up to 8,000 CSG wells have been operating and all spills greater than 5m³ in volume must be reported to the regulator” which contradicts Santos’ own 2015 Sustainability Report which acknowledged two fines for the release of produced water to land at the company's Queensland CSG operations.

Bushfire risk: Santos claims that its application of an FDI rating of 120 (catastrophic) means it has accounted for the impact of climate change. But there is still no engagement from them about the increased frequency of this danger rating occurring over the 25 year life of the gasfield as a result of climate change. For example, the original risk assessment upon which this assurance is based applied standard ambient atmospheric temperature of 25 degrees C and average humidity based on the 2008-12 average. They clarify that the 1 in 70 year fire likelihood is the likelihood that *any* fire will be caused onsite, not a likelihood of fire moving beyond the project site. They’re now claiming that for “ignition scenario impacting beyond the site boundary, the cumulative likelihood would be considered in the order of 1 in 2,600 years, but offer no explanation for how they arrived at this figure.

These late submissions have not changed the fact that -

This project is too UNSAFE. The reason it is so unsafe is because Santos is untrustworthy by continuing to OPENLY LIE to you and the public. If they can’t be trusted with such a history, how can they be trusted into the future?

***Stop claiming to be an Australian company.** With continued investments from foreign companies, now owning a large proportion of shares, this includes the Chinese ENN/Hony who now own such a large percentage that they have a seat at the shareholders table.

***Stop Santos from misusing words such as “safe” and “sustainable”** when promoting this project. By clear definition from the dictionary they do not meet this. To continue doing so is openly lying to you and the public.

Merriam-Webster dictionary states SAFE as – “free from harm or risk”.

How can this claim be, when there are over 100 separate incidents, just from CSG exploration in the Pilliga Forest found on this interactive map www.csgtoorisky.com ?

Merriam-Webster dictionary states SUSTAINABLE as – “capable of being sustained....of, relating to, or being a method of harvesting or using a resource so that the resource is not depleted or permanently damaged”.

Nothing sustainable about a 1 in 20 failure rate within 1 year of being drilled, and constant need of work over drills to repair and replace during its short 5 year life span.

***Stop claiming it will only impact 1000 hectares**, when in reality it is 95'000 hectares just in the project alone, not counting pipelines to the market and transport of waste.

***Stop using advertisements such as “they will never threaten water”** when they have been found and charged for having polluted aquifers in the Narrabri region.

***Saying they would only build one train for export** through the LNG plant, then building a second without enough gas to supply export markets, while draining local markets of their gas. This was told to shareholders and the public.

Also -

4 key areas of this project has;

No social licence

98% submissions from 23,000 people against this project, a record breaking number in the history of NSW, considering other projects like Badgerys Creek airport only received around 5000.

64% majority of submissions just from Narrabri postcode are against this project.

So many people both local to the project and elsewhere have protested against this project, including many chaining themselves to stop the damage from going ahead, so many that the current govt created the “Santos law” to protect gas mining businesses.

Localised door knocking surveys covering 3.2 million hectares around the North West, including the town of Pilliga, have given an overwhelming 97% not wanting to live in a gasfield. A clear result that this project is unwelcomed and unwanted.

Over 10'000 submissions just to the IPCN with an overwhelming majority against the project.

NO science licence

Not being able to implement the 16 scientific recommendations.

Insurance companies pulled cover, and further insurance agencies will not cover for future CSG.

Not having an independent analyser for testing and baseline data. Results from Santos testing are highly questionable, same from gas funded GISERA.

No political licence

Considering the joint support from most parties to support the CSG moratorium bill, that passed easily in upper house, and only narrowly missed passing by 2 votes in the lower house. It clearly has no joint political support from the major or minor parties.

No cultural licence

Considering that the Gomeroi / Gamilaraay nation has only one small voice approving the use of their traditional land through the Narrabri region, and the majority of Indigenous groups local to the area have voiced to not approve this, it is clear that this proposed project has no cultural licence either.

In conclusion, based on the poor information, questionable details, omitted information, incorrect data, out of date information, flawed methodology, assumed figures, unanswered or ignored concerns and lack of detail that Santos has provided, there is no other option except for the panel to not approve this project.

Thank you for your time,

Peter Small

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