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To: [IPCN Enquiries Mailbox](#)
Subject: Response to Santos' new material presented to IPC
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Dear Commissioners

I wish to comment on just a few points made by Santos in the new material they presented to the IPC.

Price and demand

Santos' attempt to justify the economic viability of the Narrabri Gas Project is very hard to follow. On the one hand they claim they are getting higher international contract prices (A\$12/GJ) in 2020, while also claiming the Narrabri project will bring prices down in Sydney by 4-12%. While Santos' CEO previously admitted that Narrabri Gas would be more expensive than that from other fields, around \$8/GJ.

The recently published ACIL Allen report presents a model that shows gas prices increasing over the next 20 years and staying above \$9/GJ from 2030-40. While AEMO's *Integrated Systems Plan 2020* makes it clear that gas prices need to stay as low as \$4/GJ after 2030 to be competitive with battery-supported renewable energy. The ACIL Allen report notes that demand for gas-powered generation is likely to decline between 2020 and 2028. This is supported by the fact that AGL is currently scoping a plan to build grid-scale batteries to replace Liddell.

The IPC has been presented with considerable evidence that the demand for gas will continue to decline, as consumers move increasingly to renewable energy sources, and that the remaining demand for gas will be easily met from current sources. The Santos Narrabri Gas Project is likely to become a stranded asset within its relatively short 25 year lifespan.

The trend around the world is clearly to decarbonize by moving away from fossil fuels and if Australia is to reach its Paris commitment and NSW is to reach its own emissions reduction goals then this project cannot go ahead.

Employment

According to the Australian Bureau of Statistics *Moree-Narrabri Region Data 2017* employment in Agricultural, Forestry and Fishing was 16.5% of all employment or 3,516 persons of 21,281 employed. Santos' updated offering of just 222 local jobs for 25 years maximum, can in no way be used justify this project, when it potentially puts at risk many, many hundreds of jobs in the local farming sector, and the viability of rural communities.

Bushfire & Climate Change

It appears from David Kitto's response on day 7 of the public hearing that Santos has not considered the increased likelihood of fire danger as a result of climate change. According to Dr Karl Mallon, as detailed in the original Lock the Gate submission, increased heat from climate change over the next 25 years will result in raising the probability of this project resulting in bushfire ignition from 1 in 70 years to 1 in 28 year; in other words, a high probability that climate change could result in the project starting a bushfire during its lifetime. A number of local fire fighters detailed to the IPC just how

catastrophic such a fire would be including, in their opinions, being impossible to fight.

Fugitive Emissions

I am a little incredulous that Santos rejects fugitive emissions estimating techniques adopted in the public submissions by Lock the Gate, Dr Grogan and Tim Forcey, claiming they are not appropriate reference points for the Australian Coal Seam Gas industry.

Surely the issue is not how methane emissions are measured, but that, for the sake of future generations and the planet, we cannot develop any more fossil fuel industries and have to phase out the ones currently operating. It is now time to draw down on CO2 in the atmosphere, not add more.

Conclusion

I respectfully, but very strongly, urge you to reject outright Santos' application to develop the Narrabri Gas Field. Our governments have failed us. As Barry Laing says in the SMH 19 August, "Australia's carbon budget is already in jeopardy because of our continuing extraction and use of fossil fuels and the Paris Agreement requires that to stop. Politicians are planning greater use of fossil fuels, not less. This is a crime against humanity..." I couldn't agree with him more. Your decision is our only hope to stop this very risky project from proceeding. It would not just threaten our climate, but also our agricultural economy, water and food security, our environment, health, Aboriginal culture and even the effectiveness of the research taking place at Siding Spring Observatory.

Thank you for giving me the opportunity to participate again in this process.

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