

From: [David Quince](#)
To: [JPCN Enquiries Mailbox](#)
Subject: Narrabri Santos CSG Project does trigger "The Precautionary Principle" according to one of Australia's most eminent expert Scientists
Date: Thursday, 20 August 2020 2:00:32 PM

Dear Commissioners,

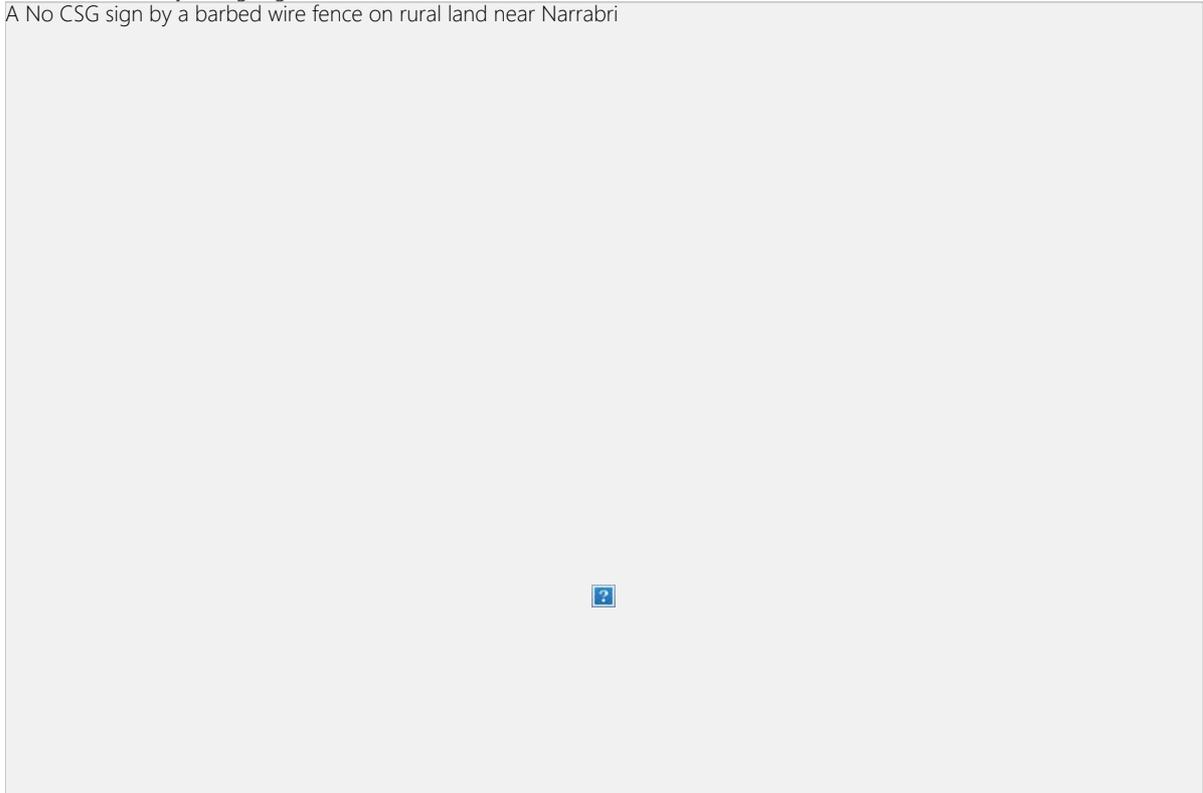
Please see attached two video clips from the recent ABC Landline Program that was based on an investigation by the veteran journalist, Sean Murphy on the Santos Narrabri Gas Project and the Article concerning it below.

Santos coal-seam gas project at Narrabri not worth the risk, scientist says

[Landline](#) / By [Sean Murphy](#)

Posted SatSaturday 8 AugAugust 2020 at 7:41am

A No CSG sign by a barbed wire fence on rural land near Narrabri



The Narrabri coal-seam gas project has proved contentious for the community. *(ABC News: Chris Gillette)*

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One of Australia's most respected scientists has claimed the Narrabri coal-seam gas project poses too great a risk to the region's water, people and environment.

Key points:

A respected hydrologist believes a coal seam gas project in Narrabri, New South Wales, poses substantial risks to water and the environment

Santos' CEO says the company will accept strict regulatory conditions to minimise environmental impact

A decision is due early next month on whether the \$3.6-billion project will be approved

John Williams is a founding member of the Wentworth Group of Concerned Scientists, which was established in 2002 to campaign for sustainable development and water reform.

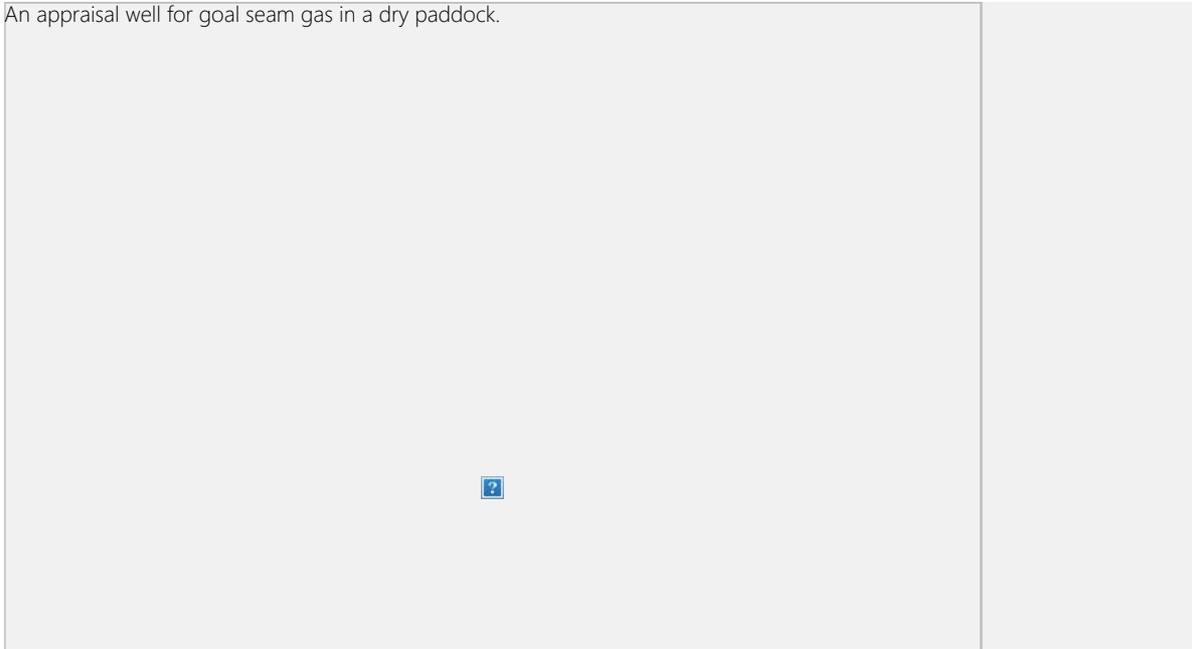
He is a former head of CSIRO's Land and Water division, a New South Wales Land and Environment Commissioner and is currently an emeritus professor and research associate at the Australian National University.

Dr Williams has cast doubt on the \$3.6-billion Santos project as it enters the last phase of a state approvals process spanning almost four years.

The NSW Independent Planning Commission (IPC) recently concluded seven days of public hearings into the project, in which it heard more than 400 submissions.

A decision is due early next month on whether the 850-well project will be approved.

An appraisal well for coal seam gas in a dry paddock.



The company is seeking approval for 850 coal-seam gas wells. *(ABC Landline: Sean Murphy)*

'Not worth the risk' to aquifers

Dr Williams said not enough was known about fractures and faults in rock formations separating the deep coal seams, from which gas would be extracted, and shallow groundwater aquifers, which are crucial for domestic and agricultural water supplies.

There was a risk the aquifers could be contaminated or run dry.

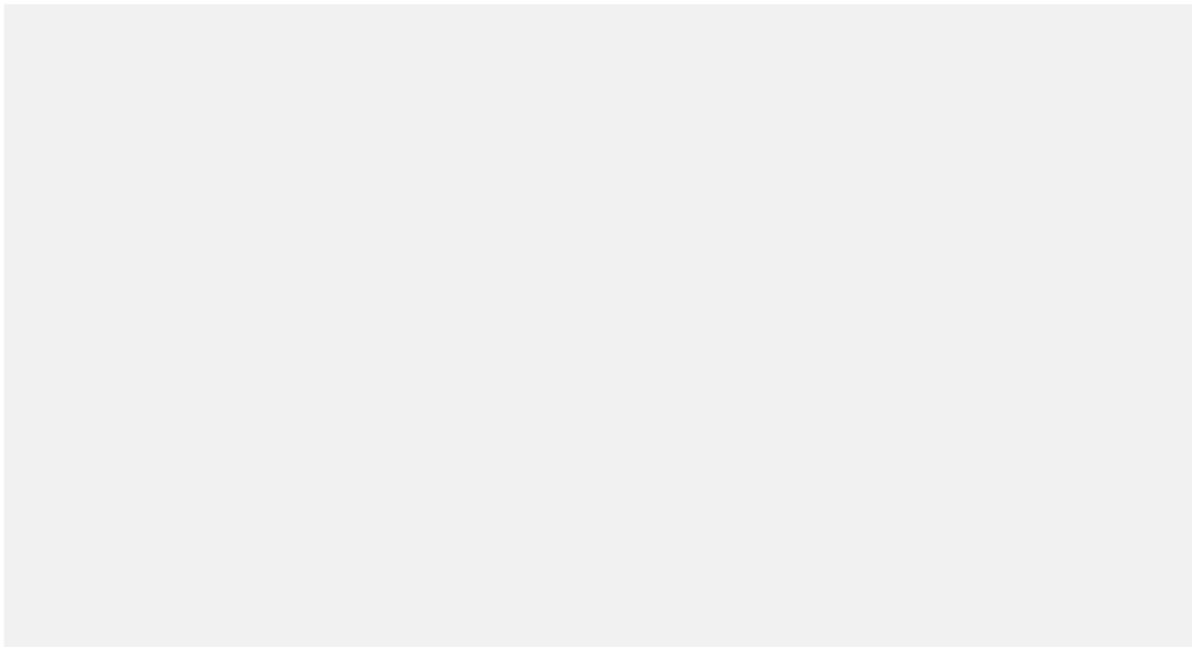
"I personally don't think it is worth the risk," Dr Williams said.

"I don't think the current analysis is anywhere sufficient [enough] to give you confidence that there is low level of risk."

He said even the oil and gas company Santos admitted to uncertainties in its own scientific assessment of the project.

"There are many things where the report has been quite honest and says, 'We don't know but we'll proceed and hope it works out,'" he said.

"That's not good enough."



Despite his sunny disposition, Dr Williams is gravely concerned about the risks of the project. *(ABC Landline: Sean Murphy)*

Dr Williams said the New South Wales planning assessment failed to consider the cumulative risks of the project on a whole-of-landscape basis.

"I think the risk to our vegetation and habitat, the risk to our agricultural land and the risk to our water resources is such that I don't think we are in a position, in my view, to say there is no risk to any of that," he said.

A man with a white beard and glasses smiles at the camera, with a tree behind him.

At the recent hearings, both Santos and the Department of Planning, Infrastructure and the Environment claimed the project was subjected to rigorous scientific assessment and it could be developed with minimal and manageable risks to the environment.

Planning department director David Kitto said an independent panel of water experts had identified uncertainties about the geology and hydrogeology of the gas field, but found these could be managed with robust monitoring and regulation.

"None of our assessment has identified any potential or irreversible harm that would result from the project and in our view, the project does not trigger the precautionary principle," Mr Kitto told the hearing.

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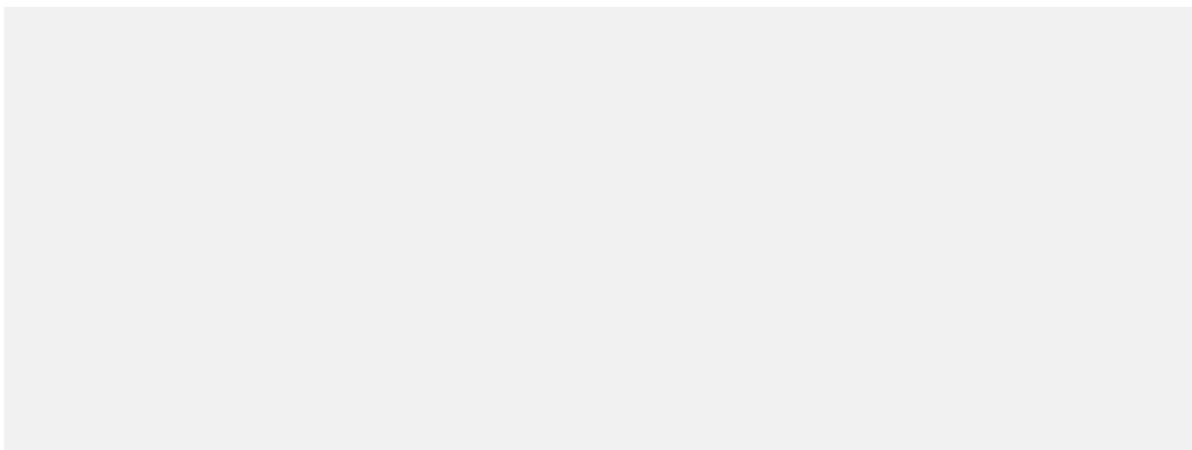
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One of the state's most controversial projects

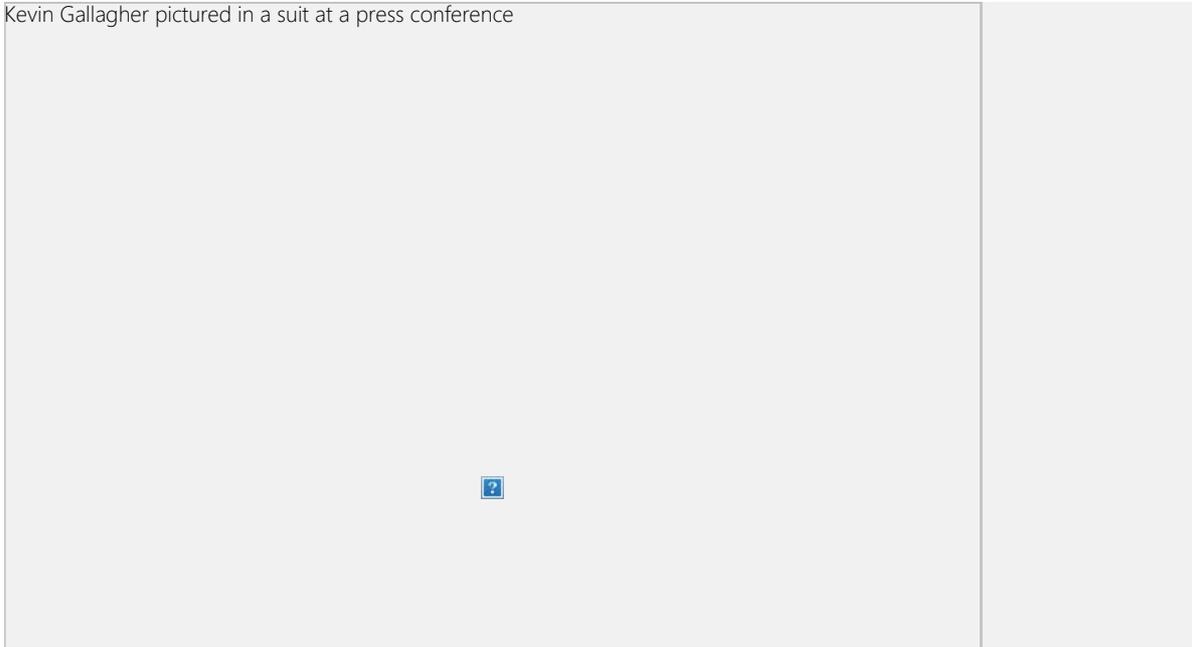
If approved, the Narrabri gas project could supply about half of New South Wales' demand for natural gas and, according to Santos chief executive Kevin Gallagher, would "put downward pressure" on prices and deliver about \$1.2 billion in royalties to the State Government.

Mr Gallagher said the company was prepared to accept strict regulatory conditions to ensure the project had no significant impacts.

The Narrabri gas project has been one of the most controversial and contested projects in New South Wales planning history.



Kevin Gallagher pictured in a suit at a press conference



Mr Gallagher maintains the Narrabri project will adhere to strict environmental regulations.(ABC News: Mitchell Woolnough)

A record of almost 23,000 submissions were made to the environmental impact assessment, with 98 per cent opposed.

About 80 per cent of the objections were form letters from groups such as the Lock The Gate Alliance.

The Narrabri Shire Council is supporting the project.

It believes Santos has earned a social licence to proceed and there is growing local support for the project.

The IPC is due to make its decision by September 4 and if approved, the project will then need a green light from the Federal Environment Minister.

Watch this story on ABC TV's Landline at 12:30pm on Sunday, or on [iView](#).

Dear Commissioners, as articulated by Dr. John Williams in his expert view this project most certainly triggers "The Precautionary Principle" and the risks it poses to our valuable & essential underground water, used in the North West of NSW for not only the vital Agricultural Industries that contribute so much to this state's economy but also to domestic use as well, allowing the communities that inhabit these areas to survive even in times of severe & catastrophic drought which we have just experienced.

If this Project is approved on what is the most controversial and clearly incomplete science not only being opposed by the community at large but also by many eminent experts not only in the fields of GeoHydrology but also Ecology, Agriculture, Animal & Human Health, Emissions, Climate Change and a myriad of other factors that this Project would impact on.

The implications and cost, not only when either irreparable damage or contamination occurs would undoubtedly exceed the most profitable "Cost Benefit Analysis that the Proponent Santos or the relevant Government Departments that would seem hell bent on promoting this high risk and unneeded and unwanted development as there is a far more cost effective and efficient alternative to provide NSW with Gas if it is indeed needed, which is also questionable with the already approved Port Kembla LNG Conventional Gas Project.

Also the cost would flow on Intergenerationally to all those impacted by any damage and future generations would also share this cost.

Hence I would earnestly urge you to reject this Project as articulated by both Santos and the NSW Government Departments considering this Project as they both have admitted to the fact that "Adaptive Management" is a major consideration in this Operation. Which can not be considered with something as critical & crucial as our valuable underground water and environment.

Yours Sincerely David Quince

<https://vimeo.com/449209911>

<https://vimeo.com/449209287>