

Keith Platt
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NSW 2101

Dear Sir,

I have objected to the proposal from Santos to develop the Narrabri gas field, I would also like to comment/object to the latest submission from Santos.

Santos has been given an extension of time to reply to some of the public submissions and to amend its own submission to neutralise some of the comments. Further submissions from objectors are limited to responding to the Santos reply. This has allowed Santos to frame the discussion on its own terms with its own information.

As the Santos reply was put into point form, I will also make comment in reply in the same format.

1. Why the Project is needed

The provision of gas into the Australian gas market does not guarantee gas for NSW. The report implicitly asks to treat it as a world commodity as it bases gas demand and price on international markets. Although "Santos has committed to allocating all production to the domestic market", (Executive Summary Pii), it also states that this will replace gas from other fields that will then be exported.

Domestic demand for gas is projected to be relatively flat (Update 2 P2) but the three Gladstone gas trains –" have a combined gross gas requirement of around 1,500 PJ/a— around triple the amount of gas currently used in the entire eastern Australia domestic gas market" (Update P2)

NSW Net Zero Plan

This plan argues against gas usage rather than support it. The production of gas is not referred to within the report. The report states demand for low emissions products is rising, low emissions technologies are cost competitive, households are already taking low emission action.

The Santos proposal is directly against the Net Zero stated priorities of

1 Drive uptake of proven emissions reduction technologies that grow the economy, create new jobs or reduce the cost of living

2 Empower consumers and businesses to make sustainable choices

3 Invest in the next wave of emissions reduction innovation to ensure economic prosperity from decarbonisation beyond 2030

4 Ensure the NSW Government leads by example

The commissioning of the Narrabri gas field is in opposition to all the objectives of the NSW Governments Net Zero Plan.

Australian Energy Market Operator's (AEMO) Integrated System Plan

This plan considers that gas may have a role in replacing coal generators but it also minimises this possibility through its findings that;

1. Distributed energy generation capacity is expected to double or even triple.
2. Over 26 GW of new grid-scale renewables is needed.
- 3 The advantage of gas in dispatchable power could shift to batteries. Especially in 2-4 hour periods.(p55)
- 4 Stronger interconnection between NEM regions reduces reliance on gas power generators.(p.56)

As Federal Government is increasing the interconnectivity of the electricity network and increasing the development of pumped hydro then the demand for gas and gas fired power stations will reduce.

2. Downward pressure on NSW gas prices and more jobs

The Santos report states several times that the price of gas is set by - "the price tolerances of consumers, producers' marginal costs of production, and the optimal operation of the gas transportation network". Not the usual supply/demand equation, this is because " the Gladstone gas trains for the export market "have a combined gross gas requirement of around 1,500 PJ/a— around **triple the amount of gas currently used in the entire eastern Australia domestic gas market**". The market forces to keep these gas trains supplied will overwhelm any influence from the NSW gas market.

An interim report by the Australian Competition and Consumer Commission (ACCC) determined that ;

"Consumers and businesses on Australia's east coast are paying significantly more for gas than international customers buying its liquified natural gas (LNG) exports" (ACCC media release 17 August 2020)"

"Consumers and businesses on Australia's east coast are paying significantly more for gas than international customers buying its liquified natural gas (LNG) exports"

"The ACCC is very concerned with the widening gap between domestic and export parity prices"

These findings from the ACCC, the admission by Santos that the traditional supply/demand/price curve does not apply to gas prices and the overwhelming demand for gas for the three export plants show the claim for downward pressure on prices is confected and weak.

Unless the gas from the Narrabri field is specifically reserved for use in NSW it will not affect its resale price. Gas in West Australia is specifically reserved for WA industry and results in lower gas prices, as happens in Texas and other regions/countries.

The forecast of more jobs in development applications has been shown to be unreliable and of no relevance to the final project. The statements about job creation are to be treated with scepticism. No supporting documentation or guarantees are given about how these figures were developed. The enquiry into the Adani mine showed the company and state government quoting employment numbers that overstated research by Adani by over 300%.

3. **The role of natural gas in a low-carbon economy**

Santo maintains that gas is a critical transition fuel. Yet in this submission it is arguing for an increase role in the use of gas in applications where it could be removed. The AEMO report previously quoted by Santos shows a decreasing demand for gas. The development of a renewable based industry fits in with the aims of the quoted NSW net zero policies and the AEMO 2020 policy statement.

5 **Greenhouse gas and climate change**

The analysis of DR Grogan is based upon an interpretation of a DIGS website. In table1, his interpretation is shown to be out by almost 300% to the actual data.

7 **Greenhouse gas and climate change**

The salt waste is not defined. It is not sodium chloride – salt, it contains many other minerals and additives that will remain undisclosed. When AGL wanted to develop the Gloucester gas field the water treatment plants in the Newcastle and Sydney Regions refused to take the extracted salt water as it could not be treated. This resulted in AGL illegally dumping water.

NSW treatment plants may have the capacity to treat the water but they have stated that they are unable to do so economically and have refused to take it.

Santos and Eastern Star have so far “treated” this salt water by using evaporation pits. That is they have used put volatile compounds into the atmosphere without a pollution licence. This is not acceptable. Companies can dump waste products into the atmosphere anymore.

The alternative proposal from Santos is to build lined ponds to hold the waste and to cap them. This may be acceptable for short term holding but as “ Water use per well can be anywhere from about 1.5 million gallons to about 16 million gallons.”

https://www.usgs.gov/faqs/how-much-water-does-typical-hydraulically-fractured-well-require?qt-news_science_products=0#qt-news_science_products).

At the lowest rate of water usage this waste, contaminated water from a single well is enough to fill Lake Michigan in 666 years. At the upper level it will fill Lake Michigan in 62 years. That is from a single well. The proposal from Santos to line, cap and bury this amount of waste is ludicrous.

And it is supposed to stay sealed forever to stop contaminants getting into to the soil and water table.

8 Incident notification protocol

Despite delays and obfuscations on past incidents from this site Santos blithely accepts that it will not occur again.

14.1 Bushfire Impacts on Project Infrastructure

“The 2015 CSIRO report estimates the temperature at the tips of flames is **around 600°C**”. The well head equipment can “withstand 650°C for 30 minutes and maintain integrity”. This is only an 8% leeway, the flame front may not last 30 minutes or the steel may have a fault. But it is not a lot of safety buffer.

The fire projection makes no mention of fire tornadoes. The wind phenomena of whirlywillies is well known in the area. Combined with a bush fire and that is a fire tornado. These were shown to be so destructive in the last bushfires and in the bushfires in California and yet they are ignored in the Santo report.

The statement “the potential to start fires by means of lofted vegetative material being ignited in gas flares and falling to ground starting a bushfire. This is not supported by evidence of vegetation fires starting in such a manner, with no identifiable record of fires having started from such causes.” May be true but only because the law requires all open flames be extinguished during the fire season.

Bushfire can ignite spot fires in several kilometres in front of the fire wall (ref. bush fire commission and the last bush fires). The intensity and development of the bushfires in Victoria and NSW in 2019 and 2020 were unprecedented but they developed winds strong enough to lift fire trucks and blow them over. Flammable branches will easily be moved across a sterile zone.

These are just some of my reasons why I hope you do not approve this project.

Keith Platt