

Additional material submission

Thank you for the opportunity to comment on the additional material provided by Santos and the Department.

Department

The Department did not properly answer any of the questions asked by the IPC.

ESD: the Department's response focuses on the definition of ESD as it applies to assessments and claims that the whole report is about ESD but it really only focuses on the economic benefits and makes no attempt to weigh environmental impacts against social impacts and economic benefits. The Department has not clarified anything.

And whilst there is any doubt about the environmental impacts the precautionary principle should apply.

Net Zero Plan: the Department did not specifically answer the question about how the Narrabri Gas Project relates.

Queensland salt waste: I can only infer that no beneficial uses have been found. And it would have been helpful if there was some commentary on the storage ponds and some acknowledgement of the pollution spills.

SEARS: absolutely no attempt was made to say how Santos addressed the SEARS. And there are many omissions in their EIS including location of wells, waste composition and disposal, management plans, modelling etc.

Indeed there is a certain arrogance in the way Mr Kitto has chosen to pretend to answer. I would have thought the Department would have all the information asked of them to hand if their assessment was as rigorous as they claim.

Santos

Mr Gallagher's covering letter reads like a self-fulfilling prophecy and bears no relationship to the attachments. The project is not essential for energy security, the benefits are not significant and it is not in the public interest.

He dismissed the objectors as being anti fossil fuel when in fact the majority of objectors are concerned about the environmental impacts and the uncertainties associated with drilling 850 gas wells 1 km into the Great Artesian Basin and the impact on country held dear by the First Nation.

The economist's predictions about gas prices are at odds with those of AEMO. The report even contradicts itself by suggesting prices will remain high but at the same time the project will bring gas prices down. The economist conveniently ignores the effect renewables will likely have on gas prices in a competitive market.

And the projections on direct and indirect jobs are conjecture.

I find it odd that Santos sought a legal opinion on ESD. That opinion clarified nothing except that it is possible to talk about ESD without mentioning it. But Mr Lancaster did raise a question about

an adaptive management approach being appropriate when there are so many unknowns and management plans still to be written.

The insurance issue was misunderstood by Santos. Insurance companies assess risk and some have deemed the risk of CSG to be too great for them to offer public liability.

Santos also misunderstood the concerns about salt waste going to landfill. It is a toxic soluble waste with an unknown chemical composition.

I don't pretend to understand aquifers and groundwater modelling but alarm bells ring when Santos says that modelling could take decades to reach a certain level of confidence if at all. And so it seems that consider damage to the aquifers and the groundwater may occur before the damage is noticed let alone understood.

Neither the Department nor Santos have dispelled any of my concerns about specific aspects of this project. Just because Mr Kitto and Mr Gallagher say everything is alright doesn't make it so. Are they willing to put their jobs, careers and reputations on the line in a written guarantee? That would be something.

My concerns that the conditions of consent have so many escape clauses still remain. And if approved the project can easily be amended.

G Gerrie

21 August 2020