

Steve O'Connor

Panel Chair,

Narrabri Gas Project

**I strongly object to the NGP.**

Some submitters questioned the strategic need for the Project in relation to gas market forecasts.

Some submitters queried whether the Project can put downward pressure on pricing and generate jobs in the Narrabri region. Comments were also made on projected future gas demand in NSW.

Some submitters suggested that the Project should not be approved as it would contribute to an unacceptable increase in greenhouse gas emissions and that any forecast shortage in energy demand could be met by renewable sources of energy generation.

Some submitters referred to the principles of ecologically sustainable development (ESD) and the proper application of those principles, in particular the precautionary principle in relation to groundwater impacts and ecological impacts and the principles of inter-generational equity in relation to climate change and social and economic impacts.

Some submitters stated gas produced by the Project would have CO<sub>2</sub> content of at least 25-30 per cent not 10 per cent as assessed.

Some submitters stated that the Narrabri Gas Project EIS had underestimated the predicted fugitive methane emissions

Some submitters stated that public liability insurance was no longer available for landholders that host gas infrastructure.

Some submitters stated that the NSW EPA Waste Classification Guidelines are not 'fit for purpose' and were not intended to apply to the classification of salt. Submitters also stated that because of the leachate that would be generated salt should not be disposed of at general solid waste facilities. Additionally, submitters stated that the volume of salt waste cannot be readily accommodated by existing waste facilities.

Some submitters stated that in the event of a pollution incident notification response protocols were inadequate or did not exist. Others said that relevant state agencies and the community should be notified.

Some submitters stated that Santos must hold Water Access Licences, and that there may be insufficient market depth for Santos to acquire the Water Access Licences required by the recommended conditions of consent.

Some submitters stated that scientific studies published recently provide new evidence of connectivity between target coal seams and shallow aquifers that was not considered by DPIE in its assessment of the Project. They state that the Project's groundwater model may significantly underestimate predicted groundwater impact on shallow aquifers. A recent scientific paper by Iverach et al (2020) was cited by a number of submissions as providing evidence of connectivity between Project target coal seams and shallow aquifers, such as the Pilliga Sandstone and the Lower Namoi Alluvium

Some submitters stated that there is potential for significant impact to landholder bores that source water from aquifers of the GOB based on the NGP EIS, but this was not subsequently assessed by DPIE.

Some submitters had concerns about the way in which the Project groundwater model characterised aquitards. Firstly, it was suggested that the vertical permeability values were not conservative, and that higher permeability values could reasonably be expected. Secondly, some submissions further suggested that the aquitards may not be laterally continuous as assumed by the model, and so this would also underestimate vertical permeability.

Some submitters stated that the recommended conditions of consent require a Class 2 or Class 3 model when it was "practical and feasible", and that this is not acceptable given the lack of certainty that is inferred from results of a Class 1 groundwater model.

Some submitters expressed concerns that the groundwater model was not designed to account for temperature dependency of modelled groundwater pressures. This was inferred to demonstrate that the findings of the groundwater model were not reliable.

Some submitters stated that the NGP EIS did not present adequate uncertainty analysis and that the findings of the uncertainty analysis undertaken by the CSIRO demonstrated that the risk of groundwater impact was unacceptable.

Some submitters asserted that the groundwater model could not accurately predict impact to the Namoi Alluvium since the Project groundwater model does not accurately model connectivity between the GAB and the Namoi Alluvium as compared to other ground water models of the same system.

Some submitters stated that the likely and scale of spills of CSG water throughout the life of the Project would pose an unacceptable risk to groundwater receptors, such as aquifers of the GAB.

Some submitters stated that the Project is located in a major recharge area of the GAB, contrary to claims made in the NGP EIS, and that this poses an unacceptable risk to aquifers of the GAB.

Some submitters stated that consultation was not undertaken in accordance with the government policy, Aboriginal cultural heritage consultation requirements for proponents (NSW Government 2010).

Some submitters stated that the Aboriginal Cultural Heritage Assessment Report was not thorough or adequate when considering cultural values of Aboriginal people. Submitters asserted the assessment did not meet the relevant assessment requirements and government policies in that regard.

Some submitters stated that there is insufficient offset land available to meet the requirements of the Project. Submissions also stated that Santos would not be able to secure adequate offsets due to the uniqueness of the Pilliga

Some submitters raised issues regarding the suitability of biodiversity offsets to account for the impacts of the Project suggesting the proposed offsets do not conform to relevant guidelines.

Some submitters claimed that indirect impacts as a result of the Project had not been adequately assessed in the NGP EIS. Written submissions stated that indirect impacts had been grossly underestimated and that a number of species are disproportionately affected by indirect impacts.

Some submitters stated that fragmentation as a result of the Project has not been assessed, others said that fragmentation has not been adequately assessed.

Some submitters stated that the Project will result in an increased impact from feral animals in the Pilliga.

Some submitters raised concerns that the approach to the impact assessment and the uncertain forward footprint make it difficult to assess the impacts of the Project. In particular concerns were expressed that the scale of direct impacts are not certain and are likely to be underestimates as they do not include access tracks.

Some submitters raised concerns regarding the level of survey effort undertaken for the NGP EIS. In particular, submissions were made that the survey effort is insufficient for some key threatened species including Koala, Pilliga Mouse, Eastern Pygmy-possum and the Five-clawed Worm-skink and that important areas of habitat were not identified.

Some submitters raised concerns regarding the status of Koala, with a few submitters also stating that the Koala is 'functionally extinct' in the Pilliga.

Some submitters raised concerns that the avoid, mitigate and offset hierarchy had not been followed. Others stated that offsets were too heavily relied on and that avoidance and mitigation were not sufficient.

Some submitters stated that impacts on stygofauna has not been assessed, and that impacts to stygofauna may be significant.

Some submitters stated that the light assessment was not accurate, measurements taken of flares with shields were not representative and cumulative impacts with other light sources were not assessed.

Some submitters claimed that Santos did not have adequate mitigation strategies in place to manage the social impacts of the Narrabri Gas Project.

Some submitters made statements relating to increased frequency and intensity of bushfires due to climate change related extreme weather conditions.

Some submitters made a number of statements relating to bushfire impacts on Project infrastructure:

Some submitters stated concerns relating to NSW Rural Fire Service staff and volunteers being exposed to heightened risk due to Project infrastructure.

Some submitters stated that there was potential for NSW RFS / Forestry Corporation of NSW equipment including bulldozers, damaging Project infrastructure including underground pipelines.

Some submitters stated the use of flares in the forest would ignite bushfires, including that wind-blown debris could be ignited.

Several submitters made reference to the likelihood of a loss of containment creating a fire being estimated at once in 70 years and it being a likelihood that there will be a 150percent increase in the probability of bushfire conditions due to climate change, raising the probability to 1 in 28 years of the Project starting a bushfire.

**The majority of these submitters, being good, honest, hardworking, upright, tax paying, truthful, knowledgeable citizens, are 100% correct. As compared to Santos who are known widely in this industry to lie, lie by omission, manipulate information, conveniently overlook information, hide behind commercial in confidence, exaggerate the benefits, grossly downplay the risks, refuse transparency, bribe communities, manipulate figures to pay little tax and no royalties, are corporate bullies, force landholders to sign confidentiality clauses, and are in this purely for monetary gain with scant regard to the health of community and the environment.**

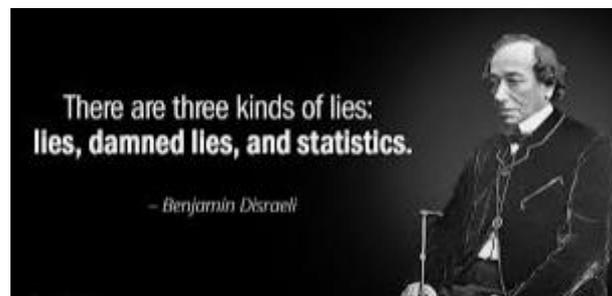
## Opinion of Richard Lancaster SC –Ecologically Sustainable Development

Although Mr Lancaster may have a wealth of legal knowledge and a fantastic way with words, his OPINION clearly shows that his knowledge of the “real lived experience” of Santos and CSG industry is very limited, therefore his OPINION with all its legal jargon, doesn’t hold any more weight than any other one of the 10,000 plus submitters.

### ACIL ALLEN CONSULTING

#### REPORT TO SANTOS (EASTERN) PTY LTD 6 AUGUST 2020 NARRABRI GAS PROJECT UPDATE OF THE ECONOMICS

It is great that Santos have PAID ACIL Allen to do an updated economics report to try and make the figures appear better than their previous report. It is common knowledge that any smart accountant or economist can make figures say whatever their **paying** clients would like them to say.



Kevin Gallagher in his Executive Summary stated-“It confirms the Project would put downward pressure on gas prices.” This is a nice warm fuzzy statement, to make out that he is deeply concerned about the price of gas for consumers. In reality, what company or business looks to produce more of whatever product it sells, to lessen the price it sells the product for ??????

And just another couple of simple points. **1.**There is no shortfall of gas in Australia. We are the biggest gas exporters in the world. **2.** There is no fertilizer plant in Narrabri, only a MOU.

## **Narrabri Gas Project (SSD 6456) Response to Independent Planning Commission Questions**

### **Ecologically Sustainable Development**

Meaning - 'using, conserving and enhancing the community's resources so that ecological processes, on which life depends, are maintained, and the total quality of life, now and in the future, can be increased.'

If you can read these thousands of submissions against this project and agree that this project will uphold this meaning, something is severely wrong .

### **Recommendations – Chief Scientist & Engineer Review**

The NSW Gas plan states - "The NSW Government accepts all the recommendations of the Chief Scientist and Engineer and we are drawing a "line in the sand" for a new and better approach for our communities and industry."

If only 2 of the 16 recommendations of the chief scientist have been fully implemented, and it is impossible to implement some of the others, why have the government crossed that line ?????

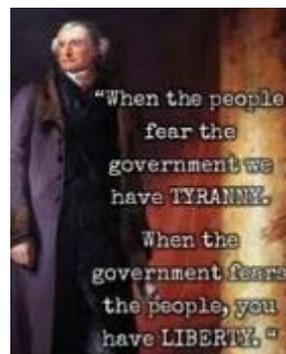
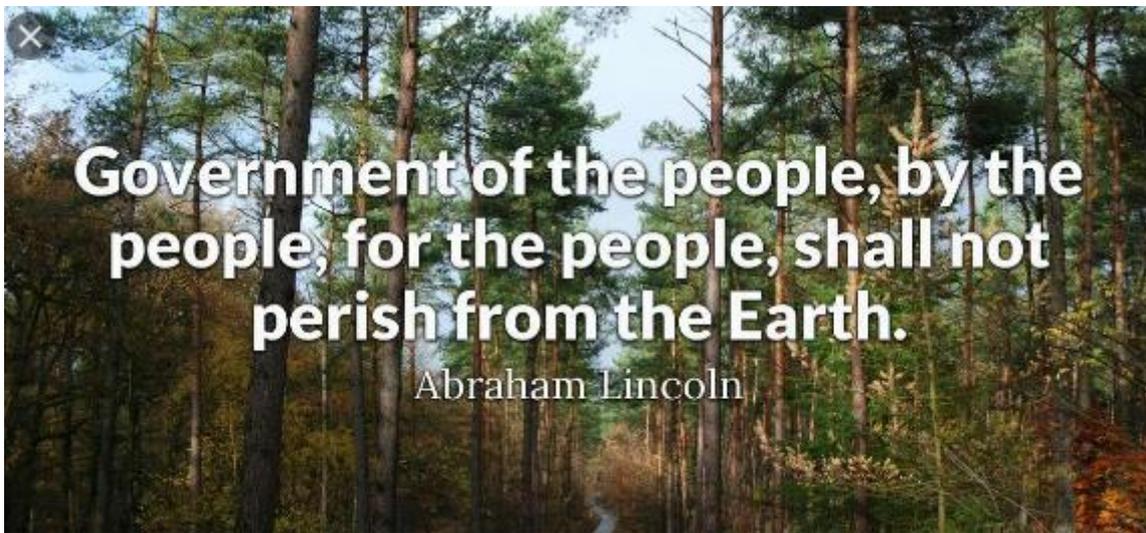
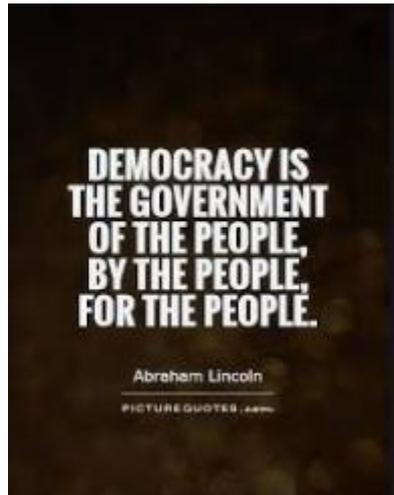
The NSW Gas plan states –"Finally, we will support companies that prioritise gas supply to NSW by actively coordinating government processes.

Let **US** ( the 98% of the community in and surrounding the Pilliga - all actively working as one, just in case you haven't cottoned on to that yet- that have clearly said NO to this project), now see whether the IPC is truly the Independent Planning Commission, or just the PC, "actively coordinating government processes."

Why are we at this point wasting all our valuable time, and yours ???????? The people have said NO.

Just say NO !!!!!

And finally, some famous quotes from influential people from history, that will be true until the end of time.



**There is no more dangerous  
menace to civilization than  
a government of incompetent,  
corrupt, or vile men.**

 Ludwig von Mises  
[www.godsonoff.com](http://www.godsonoff.com)

Any people anywhere, being  
inclined and having the power,  
have the right to rise up, and  
shake off the existing  
government, and form a new  
one that suits them better. This  
is a most valuable - a most  
sacred right - a right, which we  
hope and believe, is to liberate  
the world.

 **Abraham Lincoln**  
16th U.S. President  
(1809-1865)

**THE TWO ENEMIES OF THE PEOPLE  
ARE CRIMINALS AND  
GOVERNMENT, SO LET  
US TIE THE SECOND  
DOWN WITH THE  
CHAINS OF THE  
CONSTITUTION SO  
THE SECOND WILL  
NOT BECOME THE  
LEGALIZED VERSION  
OF THE FIRST.**

*— Thomas Jefferson*

**Government's first duty is to  
protect the people, not run  
their lives.**

Ronald Reagan

**We have the best  
government that money  
can buy.**

Mark Twain

