

Commissioners,

I write to you today as an extension to my verbal submission and subsequent written submission in complete and total opposition to the proposed Narrabri Gas Project.

With 120 plus pages to read, digest and respond to in 7 days I find myself unable to fully complete nor respond to the document that the proponent no doubt had several professionals and a team of lawyers prepare on their behalf. As a mother of 5 children (12 and under), a full time farming operation and a business in Coonamble to run I simply had very little time to digest and respond to this extension – however I thank you for the opportunity.

Santos on page 16 of their recent submission have narrowed the issue of Insurance for landholders to those who actually host infrastructure. However this generalises insurance needs for those water users who rely solely on the Great Artesian Basin (GAB) for their livelihoods and day to day living. As a farmer, business owner and community member living and working in a community solely reliant on the GAB for all our water needs I find it extremely disturbing that the proponent dismisses the very real need for environmental harms to be considered. Insurance gaps do exist and this week I contacted our Insurance Broker (for the second time in as many years) for a further explanation on exactly what is covered by our liability insurance if our water is damaged in any way attributable to the proposed project. The following excerpt is from our current insurer and our Broker informs us that this wording is similar across all the insurers in the marketplace. We can still have Liability cover – but only for our normal farming business. We cannot have cover for issues arising from or in connection with mining activities. This is interpreted to include environmental detriment.

Mining

*Despite anything contained elsewhere in your policy, we will not cover your legal liability for **personal injury** or **property damage** caused by or arising from or in connection with the exploration, drilling, mining, fracking, development and/or production of minerals, mineral resources, oil and/or gas whether or not by you or on your behalf, or any liability for **personal injury** or **property damage** caused by or arising from or in connection with you being the property owner or occupier of land used for the exploration, drilling, mining, fracking, development and/or production of minerals, mineral resources, oil and/or gas regardless of whether such activities take place on, above or below the surface of such land.*

*Furthermore, this policy excludes any legal liability for **personal injury** or **property damage** arising from any liability assumed by you under contract with any party /legal person or entity undertaking exploration, mining, fracking, development and/or production of minerals, mineral resources and/or gas regardless of whether such activities take place on, above or below the surface of such land.*

Subject otherwise to the terms, conditions, General Policy Exclusions, specific exclusions and other exemptions and limitations contained in your policy.

The proponent has stated that losses are covered by “petroleum operators”, that Santos will “indemnify landholders that host Santos infrastructure for losses” as outline in agreements entered into with landholders prior to commencement of activities (pg. 16).

Is this to be interpreted to mean that all landholders who could be affected by this project will be approached and offered a contract stating cover for loss or damage? Why does the proponent dismiss environmental concerns if they are simply not likely?

Will Santos offer environmental damage insurance? Specifically related to food production and quality assurance and will this insurance cover contaminated meat from contaminated water. A very real possibility for those hosting the infrastructure, but also importantly for those downstream artesian water users (like myself).

Why are landholders and communities being asked to bear the risks?

Why if this project is as low risk as Santos would have us believe are landholders and communities left to clean up any messes it either causes or leaves behind?

Once this project has come to completion and gas wells are no longer operational – who bears the cost of the clean up?

It may take 10, 20 or 100 years – will Santos offer insurance to cover future issues post the life of their project – public liability, accident, environmental?

My insurance will not cover it now let alone in the future – who will?

Commissioners, Santos would have us believe that the only problems likely to occur are where their infrastructure lies – however a quick glance to other CSG affected areas proves that is simply not the truth. Neighbours and landholders/communities down stream of activities will likely see negative impacts of any issues of contamination, depressurisation, spills or accidents that may occur – and yet according to Santos own submission only landholders hosting infrastructure will be offered indemnity.

How can a project with so little regard for communities and the people who live and work in them be allowed to proceed?

It is a very simple argument.

If the proponent does not wish to cover landholders and communities for any loss associated with their project – environmental or not – then they should not be allowed to conduct the activities.

I myself run a business. There is no way I could operate without indemnity for my business and all of the likely or possible issues that may arise due to my operation. My husband and I also run a farming business. There is no way we could operate without indemnity for our farming operation. We back our businesses and we have appropriate cover for our operations – to cover ourselves and others on the chance that harm or loss occurs. Surely Santos must be held to the same level of business professionalism.

Environmental contamination unlikely? Then cover landholders and communities.

Commissioners – please do not let communities and families bear the risks of this project. Santos must take environmental concerns seriously and at very least identify the ways they will handle contamination and depressurisation in terms of indemnity for landholders affected across the region – not just those hosting infrastructure. A contaminated spill for example will have a much further reach than the host land and it simply must be addressed.

Santos state on page 17 of their submission that there are a substantial number of waste facilities available to handle the hundreds of thousands of tonnes of toxic salt waste produced from the proposed project. Why then have they not outlined the facility they plan to use and how they will transport the waste?

If there are so many options for the disposal why are they as yet unable to outline their plan for it?

Santos also state on page 17 that “submitters incorrectly stated that the NSW EPAs 2014 NSW Waste Classification Guidelines do not apply to Salt”. This really does not reflect my concerns. My concerns with the “leachate” that would be generated is as a result of the “general solid waste” becoming liquid upon contact with water – creating the risk of irreversible and very serious environmental harm in the form of groundwater leaching. Santos outline some features of the “substantial number” of landfills that may mitigate this risk, but again they provide no information about the specific sites and whether they are able or more importantly willing to take the massive volume of toxic salt they will produce. It is one thing to note that these “Waste facilities” could accept the toxic waste, it is quite another to suggest that any facility would accept it. If there really are so many options for the waste disposal why is the proponent not providing their plan?

This aspect of the project continues to plague the proponent, if it was an ‘easy fix’ why are they tight lipped and still offering up no final destination.

Please commissioners, when you deliberate your decision know that there are entire communities of people reliant on you to protect them, protect their families, their businesses and their very livelihoods. Please do not gamble our futures on a project that recorded the most objections in NSW Planning history. And for good reason. The people of the Northwest overwhelmingly do not want this project. We do not want our future marred by an environmental disaster waiting to happen. There are just too many holes in the proponents plan. Please do not risk our future for a short term, high risk, high cost project – our lives and our future literally depend on it.

Kind Regards,

Rowena Macrae

Coonamble NSW