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To: [IPCN Enquiries Mailbox](#)
Subject: Submission on the Narrabri Gas Project
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IPC Commissioners

Much of the Santos late submission and Allen economic modelling could and should, have been provided before the deadline that everyone else had to work with. The convenient and belated provision of this information provides yet another favourable opportunity to give information without proper and rigorous scrutiny given the restrictive timeframe.

Repeating old and in many cases unsubstantiated claims doesn't somehow make them correct or more accurate. More "cherry picked" information, overstated projected benefits, minimised potential impacts, generalised claims and assurances, have led to a complete over reliance on adaptive management. This is particularly inadequate when the starting point is basic modelling projections fed with incomplete baseline data. In many key areas there are still no practical operational plans available, and therefore no way of assessing whether they can be successfully implemented as opposed to a desk top study. Some examples of this from the recent Santos submission:

1. Committed to preparing detailed social impact management plan for approval by secretary of DPIE only after determination. Promise this WILL address project approval conditions.
2. Pollution incident response management plan WOULD be reviewed and updated to apply also to the project. Santos claim that given the proposed risk controls that WILL be in place, the likelihood of significant spill going undetected and unmanaged is very small. This despite Santos already second guessing where and how future monitoring would be required. Santos also claim CSG is GENERALLY free from potential contaminants.
3. Comprehensive fire management plan WILL be developed in conjunction with landholders. This despite the reservations of firefighters and last minute major changes to their existing plan.
4. Under conditions of consent Santos WILL prepare a groundwater management plan including monitoring system to improve modelling certainty on quality and quantity.

INSURANCE

Insurance remains "available" dismisses the limitation of a single insurer not providing cover when they are in fact a major "umbrella" group representing many smaller insurance companies that cover most of the agricultural sector. They claim we should be satisfied with "combined effect of insurance, legislative protections and indemnities provided by petroleum operations". This when the limitations of their policies are not publicly available.

SALT

Passes the responsibility for disposal and regulation onto others and claim the existing EPA requirements and guidelines are sufficient; this ignores the Chief Scientist's recommendations that they are clearly not suitable. Having had years there are still no concrete "beneficial reuse opportunities" or disposal plans in place. Instead another promise that they WILL provide a beneficial reuse and disposal study prior to phase 2.

This is not surprising when there have been massive variations in just how much salt and/or produced water will actually exist, not to mention conjecture on the nature and extent of contaminates. Santos claims "there is minimal maintenance in the long term" when it comes to existing landfill; however, this completely understates the burden on local councils and others to meet their obligations under EPA guidelines. The ongoing responsibility should be with Santos to deal with their own waste.

FIRE

The risk of "ignition from project activity is remote" according to Santos. This completely underestimates the risk of any human and other activity in extreme conditions. Their updated plan to provide their own protection for their own infrastructure ignores the fact that fires don't start and stop at infrastructure boundaries. There will be undeniable practical limitations on how fires are fought in the Pilliga and ignores actual recent failures to protect critical infrastructure during the last fire season.

WATER

There is a huge range in projected model outcomes for water production volumes and extraction rates "over the life of the project", are not as important as annual extraction in severe drought conditions.

EMISSIONS

Santos recent submission focuses on their Carbon Dioxide emissions compared to coal. This ignores the relevance and possible extent of methane emissions and there is increasing evidence that methane leakage can be substantial enough to make gas emissions on a par with coal. They also state in a typical operating year they are likely to trigger the 100,000 tonne Carbon Dioxide emission threshold and therefore be subjected to the Safeguard Mechanism. They also claim Narrabri Gas has a very low Carbon Dioxide content based on "cherry

picked” data while acknowledging there is large variation across the field. They have hidden behind “commercial in confidence” rather than providing more conclusive data.

LEGAL OPINION AND SOCIAL LICENSE

Under your brief as Commissioners to pay particular attention to key issues raised in the public hearings, I can not see the relevance of the submission by Richard Lancaster SC, particularly in regard to providing legal definitions of what constitutes public interest consideration. In no way should the opinion of one person be allowed to undermine the many expressed concerns over the lack of Social License.

ACIL Allen ECONOMIC SUBMISSION

“This theoretical model” heavily relies on assumptions on gas prices from various sources and the belated reduction in expenditure on capital assets to improve the cost benefit analysis. Although recent it ignores current gas usage projections by some in the industry and price falls leading to concerns over possible stranded assets.

Seems to downplay the cost of the pipeline to deliver gas to the eastern market not including the pipeline tariff in the cost of delivery.

Conclusion

In its submission Santos constantly compares the Narrabri project to that in the Surat Basin and overseas but only when it considers it to be favourable. At the same time they reject criticism on the basis of such comparisons should not be made and are not creditable. There are so many claims, “cherry picked data and projections”, unquantified assurances and reliance on plans that WILL be developed; that by necessity that the focus has had to be on adaptive management with the trust in the success of existing monitoring and regulation criteria. This despite the Chief Scientist recognising there will be failings and subsequent need for key recommendations.

Foresight trumps hindsight every time and over reliance on modelling has been disaster in the past.

Tom Walker

Sent from my iPad