

**From:** [Robyn Bird](#)  
**To:** [IPCN Enquiries Mailbox](#)  
**Subject:** NARRABRI GAS PROJECT SUBMISSION ON NEW MATERIAL  
**Date:** Friday, 21 August 2020 4:17:06 PM

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Dear Commissioners,

Please accept my submission on the Narrabri Gas Project New Material

I am a retired pharmacist and have spent most of my working life as a locum pharmacist in the North West and Hunter regions of NSW . Since retiring I have spent some time farm sitting including a farm on the Liverpool Plains.

Assessment of Impacts to water bores of the Gunnedah-Oxley Basin

Santos Report 9.2.2

I am still concerned about possible adverse impacts on the bores which connect to the deep water of the Gunnedah-Oxley Basin.

Santos simply says that "This scale of potential impact to water bores can be adequately managed through monitoring and adaptive management as prescribed in the recommended conditions of consent which allow for early detection of drawdown effects in the Gunnedah Basin". Santos has not provided any new information to substantiate this, nor has the DPIE given new data, so the only reliable advice is that given previously by the DPI 's ESP that the model used by Santos had poor predictive capacity in relation to the impact of production of the surrounding impacted water sources"(warnings p315). Thus the DPI's water division is saying that the model bring used by Santos cannot predict impacts on these landholder's bores .

Santos also says "The potential risk of impact to these bores greater than the minimal impact criteria of two metres drawdown is considered negligible. Even if it is assumed that these bores extract water from the same coal seams targeted by the Project) ie early Permian formations of the GOB), groundwater modelling shows only four of these bores are located close enough to be potentially affected. Figure is on p23 of the report. However there has been no new modelling done by Santos

The Santos report says states "The monitoring network would identify any issues many years(likely decades) in advance of any effect and if required make good provisions would be straightforward and effective." The sentence does not make sense . There are possible some words left out. In any case the advice from DPIE Water is that Santos proposed groundwater monitoring network in the GOB is not adequate to achieve this.

The Precautionary Principle should be applied in this case.

Santos Report Aboriginal Cultural Heritage.

Santos Report 10.1 Compliance with consultation guidelines

Clearly the consultation carried out by Santos was inadequate given that many Gomerioi people have said this. People from the whole Gomerioi nation have gathered in peaceful protests against this project and one Gomerioi man , Nathan Leslie said, "Not the right place, not the right time" Northern Daily Leader 30/6/20. Gomerioi people spoke against the project at the public hearings, one Gomerioi elder, on behalf of the Gomerioi people

said "no mines, no gas mines in the Pilliga" and spoke about the surveys she had completed. There is a power imbalance between Santos and the Gomeri people. ( There is always a power imbalance between Big Mining and those affected by it.) Santos does not mention that there was legal representation or a mentor to assist the Gomeri people . The voices of the Gomeri should be listened to.

## Santos Report 10.2 Cultural values of Aboriginal People

The report , in the last paragraph, says Aboriginal people are responsible for the management of their heritage. Yet, in the 4th paragraph , the report ambiguously says under the terms of CHMP all currently known sites and the most sensitive site types will be completely avoided by the Project. If the Gomeri are responsible for the management of their heritage then they should be free to chose any or all site types whether they are sensitive or not and there should be a thorough assessment of the project site consent is given for the project.

The third paragraph the report states "The assessment concluded that by application of the avoidance principle there would be no impact on cultural heritage sites that have been assessed of high significance. The Great Artesian Basin and it's waters are of immense significance to the Gomeri people . They have maintained the GAB and its' waters for millennia ,and it has sustained them. Santos will not be complying with the avoidance principle in relation to the GAB, because it is drilling for gas in the GAB and will have well pads and wells in the Pilliga recharge area.

## DPIE Response p2

This response states that Aboriginal Cultural Heritage would not be significantly affected. This is not true as the Gomeri would not have control of Pilliga landscape, their landscape or all of their sites , as only the most sensitive site types will be completely avoided. Santos, the proponent of the project, is responsible for establishing the Aboriginal Cultural Heritage Advisory Group, thus this group would not have any right to protect or save Gomeri heritage or cultural site or artifacts . This Group would not have any rights to implement its own advice, Santos would make the decision.

## Santos Report Ecology and DPIE Response Ecologically Sustainable Development.

### 11.3 Indirect Impacts

Santos says that indirect impacts have been "quantified and assessed in detail" and says that this includes traffic and accidental spills . However my concerns about the health of the native cypress of the Pilliga and Eucalypts have not been addressed. Phytophthora Dieback is a disease of many native plants including the native cypress of the Pilliga and Eucalypts Is is sometimes difficult to detect because the disease results in affected vegetation looking like it has been drought affected. Phytophthora is known to be introduced on the tyres of vehicles and soles of boots.

<https://www.environment.gov.au>

Santos has not addressed in detail the role of traffic in the introduction of Phytophthora and how it would prevent this occurring.

Cypress trees in the Pilliga have a symbiotic relationship with mycorrhizal fungi. This information was given at the hearings by Dr. Leonard Tesoriero , School of Environmental and Life Sciences, University of Newcastle. These fungi provide the fungi with some

essential nutrients. Root disturbance caused by salinity disrupts this symbiotic relationship and the cypress trees are adversely affected. Santos has not addressed in detail the effect of a saline spill on this aspect of the health of cypress trees of the Pilliga and how it would prevent this.

Trees are important in the Pilliga as they provide shelter and habitat for native animals, plants and fungi. Trees are important for soil structure and drawing moisture into the ground.

The DPIE Response on p 2 says the project would not significantly affect the environment which is not accurate if the introduction of Phytophthora Dieback to vulnerable native plants species or the effect of the disturbance of the symbiotic relationship between Pilliga cypress pines and mycorrhizal fungi has not been considered and measures put in place to prevent these adverse impacts from occurring.

Santos Report 11.6 Approach to impact assessment / uncertain forward footprint and 11.7 Survey effort did not mention Phytophthora or cypress or Eucalypts of the Pilliga.

Santos Report . Public liability insurance for landholders.

Section 6 p16.

Santos says that Public liability insurance policies remain available, from various insurers, to farmers who host natural gas activities. This is becoming increasingly difficult. Today Suncorp announced in the Australian Financial Review that it will stop insuring and investing in oil and gas projects by 2025, and cease investing directly in fossil fuels by 2040

<https://www.afr.com/companies/financial-services-companies-to-stop-insuring-oil-and-gas-20200821-p55nwn>

Landholders cannot be expected to host gas infrastructure in a climate when more insurers are unwilling to provide the appropriate third party insurance.

The DPIE Response to Independent Planning Commission Questions.

P8 "The statement that no single project can affect global climate on its own, and the direct and indirect greenhouse gas emissions of the Narrabri Gas Project would be very minor compared to annual global emissions" is true but it is a silly and irresponsible statement to make in relation to a company's responsibility in contributing to climate change affects which affect present generations and will affect generations in the future. Every single Green House Gas emission contributes to Climate change. The statement would be as silly as a doctor telling a patient he had cancer of the ear but not to worry the ear is a very small part of your body. It would be irresponsible not to stop the cancer before it metastasised.

This project will produce 5 million tonnes of green house gases per year. This is not insignificant. Australia should be producing 7.5 million tonnes less of green house gases per year in order to meet Australia's Paris Climate commitment of a global temperature rise of between 1.5 to 2 degrees

Santos Statement 1 Why the Project is needed., 2 Downward pressure on NSW Gas prices and 3 The role of gas in a low carbon economy.

One of the justifications is the MOU between the NSW and Commonwealth Government

where in order to have joint funding of over 2 billion dollars in energy and emissions reductions initiatives the NSW government is to supply an additional 70 petajoules per year of natural gas( this is a non-binding target.) into the east coast gas network. p5

This does not mean that the gas has to come from the Narrabri Gas Project.

There are two other potential projects , one of which already has development consent , which could provide the same amount of gas if actually needed . The NSW Premier has already stated that she does not mind where the gas comes from. See Expansion of Port Kembla gas import terminal could spell end for Narrabri Project ABC news Patrick Bell 21.4.20

This is just an MOU between the NSW and Commonwealth Governments. NSW is not required to use fossil fuels if there is another source of energy.

Santos only compares gas with coal and not renewable energy when it makes claims about emissions. The article " Oil and Gas firms have far worse climate impact than thought. Guardian Jonathan Watts 20.2.20 illustrates this

Santos cites modelling for the World Energy Outlook indicating that under its "Sustainable Development Scenario " global gas demand grows by 14% by 2040 compared to 2016 , but fails to mention that growth in gas demand since 2016 has already exceeded this amount and so the WEO 2018's Sustainable Development Scenario would see gas demand contract on 2018 levels by 3.4%. The WEO 2018 clearly states that a "A three-way race is underway among coal, natural gas and renewables to provide power and heat to Asia's fast-growing economies"

The new ACIL Allen report notes that "Gas Power Generation demand is likely to decline from 92PJ/a in 2020 to 30PJ/a by 2028" in the eastern gas market . They anticipate that it will rise again after 2030 when more coal power stations close, but AEMO's analysis clearly shows that this will only happen if the gas price is half or less than ACIL's forecast. The recent announcement by AGL that they are planning to transform Liddell coal power generation site in NSW into a grid -scale battery with 850 megawatts of electricity storage. There are plans in the NSW Hunter region to innovate the Tomago Aluminium Smelter so that it will act as a virtual battery providing electricity to the grid when needed. The other large Aluminium Smelters in Australia could use similar technology to also act as virtual batteries.. These smelters "can rapidly dial up or dial down the amount of energy they consume , turning them into a virtual battery that helps stabilise the grid and provides an income stream to owners.

Origin energy is also planning to add battery storage in NSW.. Batteries hold key in quest for flexible power , AFR, 25.6.20 Angela Macdonald-Smith

The Dubbo Renewable Energy Zone (REZ) is already oversubscribed.

The NEW England REZ has the potential to produce as much energy as all of the state's coal-fired power stations.

In our area The Manilla Community Renewable Inc, [www.manillarenewableenergy.com](http://www.manillarenewableenergy.com) will have a solar farm under which sheep can graze and a hydrogen battery , the first of its type, to store energy . The arrangements with the landholders have been made.

In Narrabri , [www.geni.energy](http://www.geni.energy), is a local not for profit company planning a renewable energy hub as well as battery storage.

There is no need for CSG gas as a transition fuel. IT is a polluting , green house gas , which increase climate change. The renewable energy and storage of the present will increase and new forms of storage will and are emerging such as snow2.0, virtual batteries such as Aluminium Smelters and, hydrogen batteries .NSW is facing the biggest and quickest transition in the country which AEMO says will experience the fastest energy transition to renewables in the world( <https://reneweconomy.com.au/worlds-fastest-energy-transition-aemo-maps-path-to-renewables-26955/>)

DNSP's (distribution network service providers) and Energy Providers can use tools within demand management programs to ensure stability, efficiency and rekisbility of the grid.

Santos says that the carbon dioxide content of produced gas is lower than the CO2 content of the gas underground . This cannot be verified as Santos says the information is unavailable for reasons of commercial confidentiality.

Santos does not report it's own parlour financial state,  
<https://reneweconomy.com.au/Santos-latest-to-write-down-gas-investments-as-total-australian-losses-near-20-billion-26668/#respond>

None of the New Information supplied by Santos or the DPIE's Response which I have discussed would lead to any other conclusion than rejecting the Narrabri Gas Project.

Thank you for the opportunity to send this submission to the New Information

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[Sent from Yahoo Mail on Android](#)

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**Subject:** NARRABRI GAS PROJECT NEW MATERIAL  
**Date:** Friday, 21 August 2020 5:00:53 PM

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Dear Commissioners

Please accept this addendum to my submission which I sent a few minutes ago.

I object to the proposal .

I omitted to state this at the conclusion of my submission

Thank you.

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