

Submission to the Queensland Hunter Gas Pipeline EIS Exhibition

We object to the Queensland Hunter Gas Pipeline for many reasons. As we are farmers trying to manage our business under extreme drought conditions we only have sufficient time to provide detail on two of the reasons.

Opposition to the pipeline would be immense

There is considerable opposition to coal seam gas (CSG) industry in this state at the local government level, refer to https://www.lockthegate.org.au/nsw_councils. This pipeline would traverse ten local government areas, of which two councils oppose the CSG industry in their region (Moree Plains Shire Council and Singleton Shire Council) and another seven have expressed significant concern about coal seam gas in their region (Gunnedah Shire Council, Liverpool Plains Shire Council, Upper Hunter Council, Muswellbrook Shire Council, Maitland City Council, Port Stephens Council and Newcastle City Council).

In addition, over 100 communities in North West NSW have been surveyed regarding their attitude to the coal seam gas industry with 96% of landholders over 3 million hectares rejecting the industry due to the well documented negative impacts on water, land, air, health, cultural heritage, landholders, communities and traditional owners, refer <https://www.csqfreenorthwest.org.au/>.

Opposition to the coal seam gas industry by communities has resulted in the following:

- * cessation of exploration and extraction of coal seam gas by Metgasco in the Northern Rivers,
- * the decision by AGL not to proceed with the Gloucester Gas project,
- * the decision by Santos to withdraw the Narrabri to Wellington Gas Pipeline project application,
- * the suspension for many years of all exploration and appraisal activities for coal seam gas in 13 of the 14 Petroleum Exploration Licences in North West NSW
- * the inability of Santos to meet the timeline in the Memorandum of Understanding, signed by NSW Acting Premier Andrew Stoner on Thursday 13th February 2014, that committed to, “a final decision by the NSW Planning Assessment Commission will be made on January 23, 2015” for the Narrabri Gas Project
- * the delay by APA Group’s in submitting the Environmental Impact Statement for the Western Slopes Pipeline project .

Based on the above examples of the outcomes of community opposition to the CSG industry and associated infrastructure it is reasonable to assume that, if this pipeline was to be approved by the state government, communities will not allow it to proceed.

Capital Investment Value and Jobs figures not credible

The proponent, Hunter Gas Pipeline Pty Ltd, claims that there would be no change in Capital Investment Value, number of full time equivalent construction jobs or number of full time equivalent operation jobs since the original application was lodged, refer <https://majorprojects.accelo.com/public/b7fb916f61e9d37c20ddcc14c272ee92/Att.%>

[20F%20Offline%20Form %20Former%20Part%203A%20SSI%20Modification%20Request.pdf](#)

It is twelve years since the original application stated that the Capital Investment Value was \$700 million, with 800 construction jobs and 150 operational jobs on a full time equivalent basis for a pipeline of 508-609 millimetre diameter and 820 kilometres in length, refer

<https://majorprojects.accelo.com/public/6e39f1aa3c182929b6e67864ed92cdfc/Major%20Project%20Application.pdf>

In comparison the proposed Western Slopes Pipeline application, lodged 2017, states that the Capital Investment Value is \$450 million, with 350 construction jobs and 5 operational jobs on a full time equivalent basis for a pipeline of 400-450 millimetre diameter and 450 kilometres in length, refer

<https://majorprojects.accelo.com/public/7a1ea6c44074bb1d67176336c0ffe742/Application.html>

Of note is the fact that Hunter Gas Pipeline Pty Ltd claim they can build a gas pipeline of larger diameter and through more difficult terrain from Wallumbilla QLD to Newcastle for less cost per kilometre than APA Group can construct a gas pipeline with less above ground infrastructure from Santos' "Leewood" property to Bundure, NSW

It is implausible that all pipeline construction cost components have remained unaltered in the twelve years since the original calculation of Capital Investment Value. Clearly the proponent has failed to recalculate the Capital Investment Value as many of the input costs for pipeline construction have altered over the last twelve years. Labour costs, typically the largest single cost in pipeline construction, have risen over the last twelve years, refer <https://tradingeconomics.com/australia/labour-costs>).

Likewise all other costs of construction eg. line pipe, pipeline coating, cathodic protection, surveying, engineering, supervision, contingencies, telecommunications equipment, freight, taxes, administration and overheads, have not remained static in the interim.

While the proponent did not adjust the Capital Investment Value or number of construction or operational jobs in the application for an extension of time to commence pipeline construction they maintain a website which displays information inconsistent with the information supplied in the application. Refer <http://www.huntergaspipeline.com.au/hunter-gas-pipeline>. For example, the proponents website values the investment cost of the southern 420 km section of pipe at \$500 million and it will provide 350 construction jobs and 20 operational and maintenance jobs. Therefore, by deduction, the northern 400km section is to cost \$200 million, provide 450 construction jobs and 130 operational and maintenance jobs if the figures in the application could be relied on. In addition, this website maintains that the proposed pipeline will be between 16" and 20" while the application clearly states it will be between 20" and 24"

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