

SUBMISSION: NARRABRI LATERAL PIPELINE PROJECT (NLP) ie. The Project

Final date for submission: Thursday 18-Dec-25

Thank you for the opportunity to provide a submission regarding the Narrabri Lateral Pipeline Project ie. 'the project' that has been deemed a Critical State Significant Infrastructure. Which would involve the: construction, operation (incl maintenance) and decommissioning of a buried high-pressure natural gas pipeline (NLP) and associated surface infrastructure; and being built to transport the gas from the Narrabri Gas field and then connect to the proposed Hunter Gas Pipeline (HGP).

However, I would like to express my opposition to 'the project' ie NLP as follows:

Introduction

There are many good reasons why the project is and should be opposed. And I would like to acknowledge in particular the Gomeroi people's connection to the Pilliga, Bohena Creek and all the other water courses, flora, fauna and heritage sites which make up their country that this pipeline is proposed to track through and ultimately impact.

The disturbance and damage that this particular project will inevitably create is concerning. The importance of the water, the natural wonders, rock art, ceremonial sites etc. can't be discounted and should be protected and left undisturbed. And the Tribunal by stipulating that there should be no ground or surface disturbance within 500m of Bohena Creek without Gomeroi consent is an example of its importance. Yet Santos plan to blast and drill to cut a path through the forest for their gas pipeline.

Co-dependant projects & cumulative impacts

It also, needs to be said that this NLP project isn't a stand-a-lone and the cumulative impacts created by the other staged co-dependant projects of the proposed Hunter Gas Pipeline (HGP), Jemna Lateral Pipeline (JLP) and the Narrabri Gas Project (NGP) and all associated access roads and fencing will all create significant impacts. And will all contribute to overall cumulative impacts that will be imposed on indigenous cultural heritage, the water, air and environment from the NGP in the Pilliga and right along the NLP, HGP & JLP route(s) to Newcastle.

Potential Santos future plans & cumulative impacts

Another concern should be all the anticipated impacts made to air, water, cropping lands etc. if Santos decide to develop the many petroleum licences which they hold across prime agricultural land ie. Liverpool Plains. And which will become another unwelcomed project and unnecessary stage of this creeping invasion for Santos' extraction and pipeline plans. [10:28]

Neighbouring projects & associated cumulative impacts

There is also, the planned neighbouring 'Narrabri Underground Coal Mine stage 3 Extension Project'. Which hasn't been considered in the EIS (but should be included) as another cumulative impact of the project. Because, it operates in the same coal seam as the Narrabri Gas Project but yet has been down played as being of little significance .[3-EIS:19.3&5]

Cumulative generational impacts cause by extractive industry

My personal position is that I live in the Singleton LGA with views of the valley. Where I can see and experience firsthand the unescapable degrading impacts to our environment that has become an industrialised landscape with huge voids created by the coal mining industry. With man-made lakes of heavily polluted water and waste tailings dams that nothing can survive in. And the surrounding areas which have become extremely dry and continually impacted by settling dust.

These mining operations which continue to expand have over time ruined water tables and created conditions for regular exposure to excessive PM10 dust levels. In fact, at the 16th December, 2025 Singleton Argus [1] reported via Twitter that 287 air quality alerts have been recorded so far this year ie. that is up from 172 air quality alerts around the same time last year. Which coincidentally seems to have intensified since the downsizing of the EPA announcement in November 2025. [7]

The impact to a finite resource such as water that is being depleted and polluted by these operations is particularly concerning. And like the Pilliga our location is not only rated an extreme fire risk, any decrease in the water table exacerbates these conditions. Also, the toxic dust created from these operations settles on our roof and is washed into our water tanks when it rains, creating sediment which pollutes our water supply.

**Serious issues of concern: Environment/Social
Licence/Corruption/Misleading Information/Lack of Transparency/Investor
Confidence/Poor Corporate Culture/Governance/Social Impacts**

Studies carried out by Associate Professor – Dr Ian Wright - in Environmental Science, Western Sydney University has recently worked with rural communities and collected numerous samples of sediment from the bottom of water tanks across Central and North West NSW (including Narrabri) where they found an extremely high percentage of heavy metals which included lead that “*exceeded safe lead guidelines*”. This is a result of heavy industry such as fossil fuel mining.[2]

I am reminded (as is the township) on a daily basis what an industrialised landscape looks and feels like. And I relish the day that the coal industry finally winds down. However, the Pilliga is in a remote location mostly out of sight and out of the minds of many. It concerns me that a company such as Santos with sights of developing more and more gas fields is allowed to operate in this pristine landscape. Which will jeopardise water security and a healthy environment while spreading its tentacles of gas extraction across the landscape.

John Drinan clearly explains in his book ‘*The Sacrificial Valley*’ about the destruction and degradation of environment and landscape along with the social impacts it creates for communities bought about by these extractive industries. [6] The term ‘Solastalgia’ meaning: “*the distress or homesickness people feel when their home environment is being degraded or changed negatively, even while they still live there*”. This should be considered as a cumulative impact and particularly in the case of the NGP & NLP for the Gomeroi people who the land belongs to.

From executive management to land access advisors, Santos have a reputation of deception, bullying, harassing and misleading communities and pipeline impacted landholders to get their way. While, greenwashing or whitewashing information that is provided to the public. Essentially, they have no credibility of being a socially or environmentally responsible corporation. And what makes this situation particularly unsavoury the DCCEEW is aware of this behaviour and has informed impacted landholders along the Hunter Gas Pipeline that they can’t do anything about it.

The Financial Review only recently reported (24-Oct-2025) an example of their corporate culture. Which raised shareholder concerns about the circumstances surrounding why their CFO suddenly resigned and why they weren't informed sooner. Suggesting a lack of transparency and investor confidence in senior management [5]. While in June 2024 the AER penalised Santos \$2,750,000 for breaches of the National Gas Rules [8].

Then there was also the story reported by the ABC in September 2025 about a leaking LNG tank at their Darwin LNG plant and the failed takeover bid for Santos by ADNOC who "cited a combination of factors for pulling out". However, they also revealed that not only was Santos aware of the leak at the gas plant in Sept 2020 (which it had purchased at a reduced price because of the problem). But documents reveal that ConocoPhillips' own reporting "suggested the leak could have pushed up the plant emissions by 25 per cent". And that "staff weren't to go to regulators without Santos being notified". Based on this story alone it highlights that Santos lacks any moral sense towards having a duty of care to the environment or people's safety and should not be even considered worthy of holding licence to be a CSG producer let alone gain a pipeline licence. [9]

In August 2020 Bruce Robertson - Energy Finance Analyst, Gas/LNG for IEEFA wrote a submission to present to the NSW IPC who were assessing the Narrabri Gas Project proposal for approval. And as the Narrabri Lateral Pipeline should be considered part of a staged project to NGP I feel all the points he raises need to be considered as part of the cumulative impact assessment for the NLP.

His 30-page report provided numerous reasons why the Narrabri Gas Project should have been rejected [10]. And below, I have mentioned a few from the Executive Summary that I think is an honest representation of the deceptive nature of Santos' character which can't be trusted to construct a gas pipeline:

1. ***"Santos has misled the Independent Planning Commission as to the cost savings it has made in the East Coast CSG industry."***(page 15)
2. ***"Santos is not a fit and proper entity to hold a CSG production licence in the state of NSW as it has actively flouted approval conditions in Queensland.(Page 16-17)***
3. ***"Santos' royalty claims are not transparent. The IPC should look at the CSG to LNG's industries' contribution to society in terms of tax and royalties and judge it according to its actual history in Queensland and***

not the extravagant claims of \$1.2 billion in royalties, backed by scant evidence, made by the proponent of this project, Santos.(page 20)

4. ***The Queensland experience is that over 570 agricultural water bores will run dry (in just one gas field) as a direct result of CSG.*** *That the Department of Planning has not highlighted this, and the clear damage to water resources that is the lived experience in Queensland, is lamentable.(page 23-24)*
5. ***The Governance surrounding the gas industry is poor.*** *Science is conducted by the deeply conflicted arm of the CSIRO, the gas industry sponsored Gas Industry Social and Environmental Research Alliance (GISERA). (page 28)*
6. ***The NSW approvals process is not fit-for-purpose to assess CSG projects***

His statement that “*Santos is not a fit and proper entity to hold a CSG production licence in the State of NSW*” should also be something considered for the worthiness of holding a pipeline licence. Misleading the IPC, actively flouted approval conditions in QLD, lack of transparency regarding royalty claims, damage to water resources and real concerns of the gas industry influence within GISERA (which seems to have a revolving door for gas executives) and which SANTOS has some involvement, is an indication of how they operate and should be considered very problematic. [11]

The submission also raises the point that Santos doesn't have a reliable reputation of holding an honest and genuine social licence. And they rely heavily on buying it through sponsoring their way into the communities they want to exploit. Examples of sponsored initiatives range from sporting events/clubs, land care groups, local schools, promises made to local councils, indigenous people and more. As Robertson points out “*The sheer numbers of opposing submissions to the project*” ie. NGP showed that there was/is “*broad social opposition*”. [10:28] As there is also, to both the Narrabri Lateral and Hunter Gas Pipelines.

It is becoming increasingly difficult to exercise trust and find confidence in the system that is supposed to protect the interests of the people and the environment we all live in to do the right thing. Often it seems to simply boil down to a tick-a-box exercise that doesn't achieve anything except for the proponent and the rent seeking entities that rely on them for business. As Murray and Frijters explains in their book ‘Rigged’ this quote says it all “*Mates*

in big corporations, industry groups, government departments, the halls of parliament and the media skew the system to suit each other". [4]

So it was alarming to learn the reasons behind why the Native Title appeal hearing for the Gomerioi (expected to have been announced Nov-25) was postponed indefinitely. After it was revealed that not only did a Justice involved (Justice Natalie Charlesworth – one of a three federal court judge panel to determine a decision) have a personal friendship with someone who had worked on the Narrabri Project; but an associate she worked with had also been seconded to work with Santos and their legal representatives in a capacity that could easily have compromised her impartiality during the appeal. [12]

To quote Suelly Tighe, a Gomerioi community elder *"It appears to me there's a continuing circle of influence and it's blurring the lines of separation between politics and big business such as fossil fuel companies like Santos and the law, and that line of demarcation has been eroded"*. And it is equally concerning that it was the same Justice who ruled in favour of *"Santos in its appeal against the ultimately unsuccessful case against its Barossa project brought by Tiwi Islander Simon Munkara and the Environmental Defenders Office"*. [12]

So the question has to be asked: Why, is the need for this project being pushed by politicians as so critical? When Robertson explains that it makes no economic or environmental sense to be building this pipeline for the purpose of transporting high cost gas that won't reduce gas prices, is bad for the environment, has no social licence and will be *"embedding a 30-year piece of infrastructure into a fuel that we're rapidly moving away from"*. And that it is very likely going to become a stranded asset to be left for public and private landholders to deal with in the not too distant future [13]. There is no answer that makes good sense.

He also raises the point that:

"Financing for anything that involves the burning of fossil fuels is getting much harder to come by. Not only are there specific exclusion clauses from a lot of financial institutions now on coal, but increasingly they look at coal and gas as well and are restricting their exposure to these commodities."[13]

And it leaves you wondering how they could expect to get a financial investment decision (FID) for such a project that is so polluting unless they are

not being transparent about the harm this project will create and think that their buying a social licence will pay off. But regardless they don't have a social licence and there is still a large opposition to the project.

Favourable alternative ready to go

Meanwhile, there is the Squadron Energy Port Kembla Energy Terminal whose website has posted the following *"The terminal will meet forecast gas supply needs in the coming years, without the need for new gas fields in Australia, which would be a source of emissions for decades to come."* [14].

And although ABC's-Kelly Fuller reports that even though it *"is built, connected and ready to go"* it won't *"begin operations until at least 2027"*. However, Stuart Davis-Director, Squadron Energy has also said *"the delay is unlikely to benefit rival projects such as Santos's Narrabri gas field or Queensland pipeline expansions"*. He also, raises the point that unlike many projects vying to get financial investment decisions (FID), the Port Kembla Energy has already gone through the FID and finished construction and commissioning [15]. All making it a sensible solution to the future East Coast gas needs.

Conclusion

Finally, I have very briefly summarised my points of objection in relation to the Narrabri Lateral Pipeline project application below:

- Protecting aboriginal cultural heritage ie. sacred sites, rock art, water, flora & fauna etc. which will be impacted by construction techniques eg. rock blasting and heavy machinery.
- Protecting water, air and the environment from the leaking gas, chemicals and the destruction caused by construction to build a pipeline that will be part of creating an expanding industrial zone across the landscape.
- The Narrabri Gas Project, Narrabri Lateral Pipeline, Hunter Gas Pipeline and the Jemena Lateral Pipeline are all stages of the one project and co-dependant on each other ie. all their cumulative impacts should be considered together.
- Other neighbouring potential future projects ie. Narrabri UG Coal Mine Stage3 Ext. and/or development of other gas fields across the Liverpool Plains should be scrutinised/considered for the purpose of cumulative impacts.

- Social impacts on the public and communities ie. Solastalgia is a long-term problem for people who live it.
- Water security being jeopardised by: Industrial use, development, disturbed water course & recharge zones, contamination and wastage.
- Poor developer corporate culture image: reputation, shareholder concerns, lack of transparency, lacks duty of care for people and the environment, deceptive, green/white washing information provided to public, broad social opposition, poor landholder engagement, contrived social licence image.
- Poor governance and regulatory concerns including lack of trust in the public system and the influence of the gas industry within the CSIRO.
- Eroded trust in the establishment that's supposed to serve the best interests of the public. The perception of mates and influence: a system suiting each other and a "continuing circle of influence". Blurred lines of separation between politics/big business/law.
- Stranded asset: Unviable projects and abandoned infrastructure. The public and landholders left the legacy of abandoned infrastructure which can be difficult to resolve emotionally, monetarily and environmentally.
- Santos is not considered worthy of either being a CSG producer or of holding a pipeline licence.
- Financing becoming harder to come by for fossil fuel projects.
- Port Kembla Energy Terminal: alternative solution to meeting any gas needs already available without the need for new gas fields and pipelines in Australia.
- The co-dependant NLP, NGP, HGP and JLP should all be considered for their combined cumulative impacts. Which hasn't been done and this would need to be addressed and amended before the NLP project be considered.

THE END

Thank you,

Virginia Congdon



References:

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 - a. Chapter 19 – Page 19.5 - Figure 19.1 – Narrabri Coal Mine (refer key below – white line)
 - b. Also, page 19.3 'Initial screening' – Narrabri Underground Mine Stage 3 Extension Project – MOD 2 & Pillar Mining Extension (SSD-10269)
4. Rigged: How Networks of Powerful Mates Rip off Every Day Australians – Cameron K. Murray & Paul Frijters (2022:Cover page)
5. Financial Review: Santos governance under scrutiny after CFO's letter and sudden exit – Oct 24, 2025 <https://www.afr.com/companies/energy/santos-governance-under-scrutiny-after-cfo-s-letter-and-sudden-exit-20251024-p5n503>
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14. [Port Kembla Energy Terminal | Squadron Energy](#)
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