

State Planning Significant

R. Johnston

152 Great Western Highway

Wentworth Falls 2782

18.12.25

**RE: Narrabri Gas Project lateral pipeline Application No:SSI-53307723**

To whom it may concern,

Thank you for the opportunity to submit a submission in response to the above proposal and application.

- I object to the proposal on multiple grounds, considering the impact it will have on the Pilliga Forest, across 55kms of farm land and equally important, on the Great Artesian Basin water resource, where the proposed pipeline crosses major creeks which feed the Artesian Basin.

The Pilliga Forest is a culturally important place for the Gomeroi Traditional owners and has significant environmental importance, with a rich biodiversity of ecosystems.

The Pilliga Forest also directly impacts and is a major contributor for the Artesian Basin aquifer systems. The Gomeroi's cultural and spiritual guardianship of the area is deeply entwined in a long history of knowledge, the care and maintenance of the system as a whole.

The Santos proposal plan to drill 850 coal seam gas wells in the Pilliga Forest, goes against all knowledge and conservation principles in a time of critical and dangerous climate change.

A "Conversation" article (published December 17<sup>th</sup> 2025 "*How the myth of 'aqua nullius' still guides Australia's approach to ground water*"), shows "how the legacy of *aqua nullius* remains embedded within contemporary groundwater science.

The authors urge Australia to take a different approach. When rain falls, some can seep into the ground, becoming groundwater. This water can remain underground for as little as a few months, or for millions of years. Eventually it is taken up by plants, or flows into springs, rivers and the ocean.

Australia's groundwater resources underpin the economic growth and prosperity of the country. But they are under greater pressure than ever before. Legal battles over water in the NT, including extraction licenses, highlights the rapid pace at which decisions over the future of water are being made.

We must work together for a better future so our precious water is protected, not just for the next 50 years but for the next 5,000" (authors Sarah Bourke WA University, Bradley J. Moggridge UTS, Clint Hansen Monash University, Margaret Shanafield Flinders University)

Santos has ignored a recommendation from The National Native Title Tribunal which stated that all water resources, and Bohena Ck in particular, is of major cultural importance

to Gomeroi people. The Tribunal said there should be no ground or surface disturbance within 500m of Bohena Ck without Gomeroi consent.

Santos plans to drill the pipeline right under Bohena Ck and across six other major creeks, disturbing the alluvial groundwater. The EIS does not discuss the cultural significance of the entire Bohena Ck for Gomeroi people at all, and ignores the Tribunal's recommendation.

The "Conversation" article argues that "The deconstruction of colonial legacies must be facilitated by people working within government agencies and regulatory authorities, and water scientists, in partnership with Aboriginal communities. Genuine relationship building is not just an "engagement activity". It should be grounded in respect, reciprocity and an understanding of the obligation to care for Country as a living relative".

Water is a precious commodity, in short supply in global terms and affected severely by modern human decision making and actions. Australia is a hot country with an appalling record of destruction of our forests and natural environments.

We cannot afford to continue to make short sighted decisions, based on short term profit margins, attached to large corporate organizations who have a history of plundering and degrading environments, leaving a trail of pollution and damage to what was previously pristine land. The proposal itself disregards the environment and the voice of the Gomeroi.

This proposal is incompatible with caring for country, and takes its profits off shore, with little to recommend it to Australians who look to a healthy future for the environment.

The voice of farmers who work to protect their land is compelling. Clean water and agriculture are linked, and our reputation as an agricultural leader in quality food stocks is at risk from proposals which ignore the environment.

At risk are 12 farms which the pipeline crosses, "and a little under half the land it will disturb is agricultural land, one fifth of the land to be disturbed is cropping land. The other half of the pipeline cuts through the Pilliga forest".

"Construction will clear 168 hectares of forest and will cut a 30 metre wide swathe through the Pilliga East forest, causing serious damage for microbats and small mammals.

It will clear habitat and put at risk threatened species that have strongholds in the Pilliga, like the Pilliga Mouse, Eastern pygmy possum, and Corben's Long-eared Bat".

We must choose to protect our forests, our aquifer systems, our biodiversity and ecosystems.

I object to Santos's lateral gas pipeline proposal and its short term thinking for profit against the safeguarding of our precious environment. Its EIS has failed to take into account the environmental impacts, and is biased in favour of economic benefits, without regard for the cost of damage it will cause.

Yours faithfully

R. Johnston

**If you need some help to navigate the Planning portal here is a step by step visual guide detailing how to lodge a valid submission.**

### **Impacts on farm land and forest**

- 

### **Other issues**

- Santos' Environmental Impact Statement (EIS) for the pipeline claims the economic "benefits" of the Narrabri gasfield and Hunter gas pipeline, but doesn't take responsibility for the harm to biodiversity, water and climate from the bigger pipeline and gasfield.
- The EIS should be amended to consider the full negative economic impacts of the greenhouse gas emissions from the gasfield and the two pipelines, which is likely to be very significant given Narrabri is predicted to be the sixth biggest source of greenhouse pollution in NSW.

### **Knitting nanna's**

Natural gas (methane) is a potent greenhouse gas.

- Methane leaks into the atmosphere during extraction, processing, and transportation, contributing to climate change.
- The cumulative greenhouse gas impacts from the Narrabri Gas Project, Narrabri Lateral Pipeline, forestry operations, and other proposed or existing developments were not adequately considered in the assessment process.

### **Wildlife Impacts – Habitat Loss, Fragmentation, Stress**

- Pilliga Forest is a wildlife refuge and a recognised national biodiversity hotspot.
- A 12 day scientific survey of 5,000sqkm of The Pilliga from 22 September 2025 uncovered 900 species of plants, 50 reptiles, at least 15 frogs, and 18 bat species, including threatened species. <https://australian.museum/blog/amri-news/first-nations-biodiversity-treasures-pilliga/>

- Fifty listed threatened fauna species have the potential to be impacted including 26 listed under the federal Environmental Protection Biodiversity Conservation (EPBC) Act (e.g. koala, swift parrot, and Pilliga mouse).
- 168 hectares of native vegetation disturbed during construction in three threatened ecological communities.
- Clearing forests isolates wildlife from their known access to food, water and breeding.
- Increased vehicle movements, construction noise from 6am- 6pm, and dust disrupt wildlife habits.
- Wildlife will be more vulnerable to predators and stress.
- Stressed wildlife have compromised immunity to disease and infection, and have poor reproductive health.

## **Water**

- The Great Artesian Basin, other aquifers, and a large number of creeks and waterways flowing into the Namoi and the Murray Darling Basin, have not been adequately considered in the assessments.
- Local farmers are concerned about contamination and changes to drainage of local water resources.
- A leak during construction or operation could contaminate the critical recharge area for the Great Artesian Basin and other aquifers.
- Six watercourse crossings are proposed to be constructed using horizontal directional drilling methods while a further 33 watercourse crossings are proposed using standard trenching construction.
- Burying the pipeline under creeks will impact their flow and therefore the water table. These creeks only flow on the surface during floods. The rest of the time the water flow is hidden below in a bed of sand.
- Clearing land for the pipeline and access roads, could increase erosion and the runoff of sediments into nearby streams and waterways.

## **Cultural Heritage**

- Pilliga forest is important to Gamilaraay, Gamilaroi and Gomeroi people culturally and spiritually.
- Gomeroi people identify Bohena Creek as significant due to its connection to their creation stories and men's ceremonial activities. In May 2025, the National Native Title Tribunal imposed a condition on Santos to not undertake any future ground or surface disturbing work for the Narrabri Gas Project on or within 500 metres Bohena Creek. This condition should apply to the Lateral Pipeline too.
- Climate change is already affecting the Pilliga and their cultural practices.
- If water levels drop due to more droughts caused by climate change, Traditional Custodians can't exercise their cultural obligations to maintain sources of water

including chains of sandstone pools throughout the Pilliga forest. If the pools dry out, and the sandstone collapses, that affects that water source and the flow of water.

- The pipeline and associated infrastructure will divide up the cultural landscape and block access for Gomeroi people.
- A common theme in a lot of First Nation stories is that actions have consequences.

## **Other**

- [The world's largest insurance company, Allianz](#), has refused to insure properties with gas infrastructure. Owners will be unable to mortgage their properties.
- During decommissioning the pipeline would be left in place to minimise land disturbance!!





- **More**