

NSW Department of Planning and Infrastructure
23-33 Bridge Street
Sydney NSW 2000

14 September 2012

Apex Gas Exploration Project Mod 2- Application Number 07_0103 MOD2

Submission of Objection

Dear Sir/Madam,

The Nature Conservation Council of NSW (NCC) welcomes the opportunity to comment on the Apex Gas Exploration Project Mod 2.

NCC is the peak environment body for New South Wales, representing over 100 organizations across the state. We have long-standing experience in state environmental assessment and planning and are extremely concerned with the Apex proposal to construct 150 coal seam gas (CSG) wells and associated infrastructure in and around Sydney's drinking water catchment.

NCC objects to the proposal on the following grounds:

The National Water Commission¹ (NWC) has stated that coal seam gas mining risks having 'significant, long-term and adverse impacts' on water resources. Some of the threats identified by the NWC include depressurisation and contamination of aquifers, land subsidence, reduction of surface flows in connected systems, alterations of water quality, impacts on the health of wetlands and rivers and management challenges surrounding large volumes of waste water.

Coal seam gas exploration and production poses several threats to our land and water and the full extent of impacts is still unknown. Specific threats to lands include clearing and degradation of large areas of land to build roads, drill wells, lay pipelines and establish pumping, storage and other industrial development.

CSG exploration and production uses substantial amounts of fresh water, which depletes groundwater and can lead to the draw-down of aquifers and surface water, critical sources of drinking water. The fresh water pumped into the wells becomes contaminated and can escape into the surrounding environment; this wastewater can be laced with carcinogens, salts and heavy metals.

¹ National Water Commission, 'The Coal Seam Gas and water challenge', December 2010.

CSG exploration and production activities involve the extraction of large volumes of contaminated groundwater, which can contain salt, methane and sometimes radioactive compounds and heavy materials that are drawn to the surface. The management of large volumes of contaminated water presents a particularly serious threat to water quality in our drinking water catchments.

Roughly 36 toxic chemicals are used in the coal seam gas extraction process in Australia. Many of these chemicals have not been properly assessed against Australian safety standards. Some dissolve to safe levels, while others will build up over time.

In the most recent consent document signed by the Sydney Catchment Authority (SCA),² Apex received permission to bore holes within Sydney catchment 'special areas'. Special areas are there to protect the region's water supply by acting as a buffer zone to help stop nutrients and other substances that could affect the quality of water entering the storages. It is of particular concern that the Apex expansion, if allowed to move ahead, could introduce coal seam gas wells into these special areas specifically designated for protection purposes. These areas are off limits to the general public to help protect drinking water supplies and should not be opened up to mining companies.

NCC objects to the proposal to expand this exploration drilling to 150 wells.

On 28 February 2009, Premier O'Farrell provided an unequivocal guarantee that, if elected, his government would deliver protection for water catchment areas:

The next Liberal-National government ... will ensure that mining can't occur in any water catchment area, and will ensure that mining leases and mining exploration permits reflect that common sense. No ifs, no buts, a guarantee.³

Thus far the NSW Government has failed to deliver this promise. The release of the final Upper Hunter and New England Northwest Strategic Regional Land Use Plans on September 12, 2012 set a dangerous precedent for the management of CSG development in the state. These plans do not provide the needed safeguards to ensure our water catchments are protected from physical damage and mining pollution.

It is irresponsible to allow CSG exploration or production in Sydney's drinking water supplies. We urge the NSW government to reject the Apex proposal to expand its exploration activities. Coal seam gas mining should not be allowed to go ahead until environment, water supply and other risks are appropriately assessed and regulated.

CSG mining poses significant threats to Sydney's water catchment and we recommend that the Department of Planning and Infrastructure prohibit mining and gas operations in identified drinking water catchments, including, but not limited to, special areas managed by the Sydney Catchment Authority.

Yours sincerely,

Katherine Smolski
Campaigns Director

² Sydney Catchment Authority, Special Areas Mining Access Consent No. D2011/55554, February 2012.

³ Source: www.australiancoalalliance.com/Information/Woodbury%20Park%20Rally.mov.