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New England Greens, Tamworth NSW, made the following submission on the project:

[Narrabri Gas Project](#)



Objects to this project

The project is the largest development ever proposed under the modern planning system, and four times the size of the only other two CSG projects assessed and approved in NSW. Santos proposes up to 850 wells on 425 well pads over 95,000 hectares. This is more than four times the size of either of the previously approved CSG projects in NSW. The proposal includes a gas processing facility for compression dehydration and treatment of gas, a water management facility for storage and treatment of produced water and brine, possible additional power generation on site, continual flaring (burning off of gas) at two locations, an infrastructure corridor through the forest between Leewood and Bibblewindi, expansion of worker accommodation, discharge of waste water into Bohena Creek, irrigation with treated water and landfill burial of tens of thousands of tonnes of salt.

OBJECTIONS

1. Lack of detail

Santos' EIS is very short on detail. It does not provide maps indicating where these 850 wells and the lines and infrastructure that run between and around them will go. Santos is seeking a blank cheque consent for this gasfield on the promise that it will decide where the wells will go afterward using a "Field Development Protocol." No project has ever been assessed this way before in NSW and the constraints Santos propose are weak and subject to change later on. This is not an appropriate way to assess the largest development project ever undertaken under the Environmental Planning and Assessment Act and the Government must insist that Santos release details to the public about the placement of its wells, pipelines and some other infrastructure.

2. No justification for the project

The significant harm on the social, environmental and economic values of the Narrabri Shire and New South Wales that this project will inflict needs to be weighed against the economic justification for the project, but there is no such economic justification. Santos is one of several large gas companies that threw the east coast gas market and the industries that rely on it into turmoil by opening up CSG fields in Queensland and contracting to sell more gas than those fields can produce to overseas customers. They drove up the price of gas and are plundering supplies previously available to manufacturers and power stations.

The gas produced at Narrabri might be as little as 4.9% of the volume contracted for sale out of Gladstone. It's not going to bring down prices. In fact, it will force prices up, because unconventional gas like CSG is so expensive to produce and yields are so low. Research undertaken by gas company AGL shows that gas from the Pilliga would be the most expensive gas of anywhere in the current east coast gas market. The number of jobs the project will support once the construction is over is just 145. Weighed against damage to the land, and the Great Artesian Basin, this makes no sense. We need sustainable jobs, not plunder for profit.

3. The Narrabri Gas Project risks precious water sources, including the Great Australian Basin. The Narrabri gasfield poses a real risk to our two most precious water resources: the Great Artesian Basin and the Murray-Darling Basin. The area of the Great Artesian Basin with the highest recharge rates is almost entirely contained within the Pilliga East forest. In a worst-case scenario, the water removed for CSG extraction could reduce water pressure in the recharge areas--potentially stopping the free flow of waters to the surface at springs and bores across the whole Great Artesian Basin.

Creeks in the Pilliga run into the Namoi River--a part of the Murray Darling Basin. This system is vulnerable to contamination from drilling fluid spills and the salty treated water produced from the proposed 850 wells.

4. The Gamilaraay Traditional Custodians are opposed to the project, There are hundreds of cultural sites as well as songlines and stories connecting the Gamilaraay to the forest and to the groundwater beneath. Gamilaraay people are deeply involved in the battle against CSG, and have told Santos they do not want their country sacrificed for a coal seam gas field.

5. Farmers and other local community reject the project
Extensive community surveys have shown an average of 96% opposition to CSG. This stretches across a massive 3.2 million hectares of country surrounding the Pilliga forest, including 99 communities. Hundreds of farmers have participated in protest actions unlike any previously seen in the region.

6. The Narrabri Gas Project has a long history of spills and leaks of toxic CSG water--Santos cannot be trusted to manage the project safely
Santos has already contaminated a freshwater aquifer in the Pilliga with uranium at levels 20 times higher than safe drinking water guidelines, as well as lead, aluminium, arsenic and barium. In addition, there have been over 20 reported spills and leaks of toxic CSG water from storage ponds, pipes and well heads. Santos cannot be trusted.

7. The Pilliga is a haven for threatened wildlife
The Pilliga is one of 15 nationally listed 'biodiversity hotspots' and is vital to the survival of threatened species like the Koala, Spotted-tailed Quoll, Black-striped Wallaby, Eastern Pygmy-possum, Pilliga Mouse and South-eastern Long-eared Bat. The forest is home to over 200 bird species and is internationally recognised as an Important Bird Area. The Santos gasfield would fragment 95,000 hectares of the Pilliga with well pads, roads, and water and gas pipelines, damaging vital habitat and threatening the survival of endangered species.

Without specific information about where the wells and lines will be located, a proper ecological impact assessment can't be completed.

8. Coal seam gas fuels dangerous climate change
Methane is by far the major component of natural gas, and is a greenhouse gas 72 times more powerful than CO². CSG fields contribute to climate change through the leakage of methane during the production, transport, processing and use of coal seam gas.

9. Human health is compromised by coal seam gas
A range of hydrocarbons and volatile organic compounds can be released into the air from coal seam gas operations, including flaring of gas wells. The effects of volatile organic compounds vary, but can cause eye, nose and airway irritation, headache, nausea, dizziness and loss of coordination. These impacts have been documented in human populations nearby to existing gasfields in Queensland, Sydney and in America.

Santos' social impact assessment is three years old and utterly inadequate. The compendium of health studies produced by the Concerned Health Professionals of New York shows mounting evidence for health damage by unconventional gas operations, including water

contamination and respiratory illness. The Government must insist that Santos conduct a proper health impact assessment including modelling exposure pathways, reviewing literature and engagement with the Narrabri community.

In Narrabri, this project will have negative impacts on cost-of-living, the labour and housing markets. The latter is cited in as a benefit of the project but it will not benefit low-income renters. The effect of the project on cost-of-living in the Shire needs to be modelled, assessed and considered, as do the labor dynamics of the project.

10. The nation's premier optical astronomical observatory is at risk from light pollution,. The Siding Springs Observatory, situated in the Warrumbungles and adjacent to the Pilliga, is under threat from the Narrabri Gas Project due to light and dust pollution. The area has been internationally recognised as a 'dark sky park' and the 50m high gas flares proposed by Santos threaten the viability of the facility.

11. Thousands of tonnes of salt waste will result from the project. Santos has no solution except land fill for disposing of the hundreds of thousands of tonnes of salt that will be produced. Between 17,000 and 42,000 tonnes of salt waste would be produced each year. This industry would leave a toxic legacy in NSW.

12. Risk of fires would increase throughout the Pilliga's tinder-box conditions Methane flare stacks up to 50m high would be running day and night, even on total fire ban days. The Pilliga is prone to severe bushfires. The project would increase ignition sources as well as extracting, transporting and storing a highly flammable gas right within this extremely fire-prone forest.

13. Air quality

The air quality assessment fails to include health-damaging fine particulate pollution with a diameter of 2.5 microns or less (known as PM2.5). With diesel generators at each well pad and at the water treatment and gas compression plants, there will be significant PM2.5 emissions. The air quality assessment and greenhouse section also fail to model the likely substantial escape of fugitive methane emissions.