

NSW Department of Planning & Environment

Application SSD 6456

Narrabri Petroleum (oil & gas)

Pilliga Region NSW

Submission for

Orange and Region Water Security Alliance (ORWSA)

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Orange

NSW 2800

Executive Director, Resources Assessments
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Dear Director

The Orange and Region Water Security Alliance (ORWSA, the Alliance), welcomes the opportunity to provide a submission to the NSW Department of Planning and Environment; regarding application SSD 6456, Narrabri Gas Project.

Orange and Region Water Security Alliance (ORWSA, the Alliance), was formed to critically assess the Macquarie River to Orange Pipeline. The Alliance, in a revised form, continues after the approval of the pipeline as there are major development projects with water issues present in the State, inclusive of Narrabri Gas Project.

The Alliance is interested in: the review of the MDBP, the production of the Water Resources Plans, protecting aquifers (our largest water storage structures) from contamination/destruction, water management, supporting worthy projects (particularly water) by reliable and efficient approval process, achieving the best possible spend of State funds to name a few.

In giving evidence during a hearing in Orange to the "Inquiry into the Augmentation of Water Supply for Rural and Regional NSW", the Alliance made the following recommendation: "that any future development application of some importance requires a 'peer review' before public exhibition". A peer review, to accompany the EIS for the Narrabri Gas Project would have been helpful to all concerned in this case. The technical aspects of the project along with any misinformation could have been explored.

The Alliance objects to the approval of the application, SSD 6456, because the need and justification of the project is not apparent.

The possible risk, from contamination, to the aquifers in the Pilliga Region with this proposed mining activity is unwarranted. There have been some reported instances of contamination with the limited mining activity that exists and to increase substantially the number of wells would greatly increase the risk to the aquifers.

Proposed drilling through a groundwater recharge zone(s) is fraught with the danger of further contamination or destruction of the aquifers.

It is difficult to see how the proponent will deal responsibly with the expected quantities of saline groundwater and salt produce due to the extraction activities.

The review of the MDBP and the production of new Water Resources Plans for NSW, indicates a greater reliance of groundwater into the future. Groundwater in the Pilliga region (Greater Artesian Basin) should not be put at risk by this development. The Alliance would strongly support the application of the "precautionary principle" in this instance.

The Pilliga Forest, fauna and flora, does not deserve the expected amount of fragmentation expected with access roads and well pads for the expected 850 wells. Activity associated with construction phase would greatly impact on the Pilliga Forest, as would the ongoing extraction activity.

The importance of retaining the natural Pilliga grassy woodland was exemplified a few years ago when government agencies proposed to exclude non-native bees from the area. It will be interesting to see the recommendations of the various government agencies to this proposal.

The economic benefit, from this proposed development, to the State and to Australia is questionable. Australia is a major exporter of gas and there should be no reason why the local market can't be supplied by current gas fields at a reasonable cost.

This project is expected to produce 200 ongoing jobs for a limited number of years. Maintaining the existing enterprises in agriculture and other business activities may be just as productive particularly in the long term.

The Orange and Region Water Security Alliance, maintains that the SSD application 6456 would not pass a quadruple bottom line assessment at this stage whilst taking into account all the economic, social and environmental factors.

Yours Truly

Cyril Smith

Co-ordinator

Orange and Region Water Security Alliance

21st May 2017

A handwritten signature in black ink, appearing to read 'Cyril Smith', with the date '21/5/17' written below it.