

Contact Name:

Erika Dawson

Telephone:

(02) 67996866

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Ms Rose-Anne Hawkeswood  
NSW Planning and Environment  
GPO Box 39

**SYDNEY NSW 2001**

[Rose-Anne.Hawkeswood@planning.nsw.gov.au](mailto:Rose-Anne.Hawkeswood@planning.nsw.gov.au)

Dear Madam

**RE: NARRABRI GAS PROJECT - RESPONSE TO SUPPLEMENTARY RESPONSE TO SUBMISSIONS**

Thank you for the opportunity to make a submission on the supplementary response to submissions (**SRTS**) for the Narrabri Gas Project (**Project**). Narrabri Shire Council (**NSC**) makes the following recommendations.

**1. Chemical composition of produced and amended water**

Council is **satisfied** with the response provided by the applicant subject to acceptance by and conditions as required by the Environment Protection Authority (**EPA**).

**2. Bohena Creek managed release point and Newell Highway gauging station**

Council is **satisfied** with the response provided by the applicant subject to acceptance by and conditions as required by the EPA.

**3. Bohena Creek managed release and predicted cadmium levels**

Council is **satisfied** with the response provided by the applicant subject to acceptance by and conditions as required by the EPA.

**4. Water quality monitoring**

Council is **satisfied** with the response provided by the applicant subject to acceptance by and conditions as required by Department of Primary Industries (**DPI**) Water.

**5. Monitoring of natural gas wells and gathering lines**

Council is **not satisfied** with the response provided by the applicant and reiterates its previous comments, being:

**Recommendation 8**

Should development consent be granted Council requests:

1. That the Proponent pay for independent third party monitoring of decommissioned coal seam gas wells indefinitely.
2. That the monitoring be overseen by the EPA and results published on the EPA website.

## 6. Rehabilitation fund

Council is **not satisfied** with the response provided by the applicant and reiterates its previous comments, being:

### Recommendation 9

Should development consent be granted Council requests:

1. The Proponent shall pay a security deposit in the form of a cash bond or bank guarantee of an appropriate amount that covers the true cost of rehabilitation.
2. The Proponent shall carry pollution legal liability insurance that covers pollution and natural resource damage both on-site and off-site including groundwater contamination and for the benefit of the insured, third parties, and contractors.
3. The Proponent shall contribute to an Environmental Fund (similar to the Western Australian Government Mining Rehabilitation Fund) established to cover off-site remediation and rehabilitation including groundwater contamination and other long term, gradual onset damage.

### Recommendation 10

Should development consent be granted Council requests:

1. That the DPE:
  - a. Publish details of the financial assurance that the State will hold to cover the cost of on-site and off-site remediation and rehabilitation in the event of sudden accidental pollution and from unforeseen and long term impacts of the Project including groundwater contamination, and
  - b. Explains the methodology used to determine that this amount is sufficient to ensure that no costs are passed on to the Public.

## 7. Air quality impacts near Leewood

Council is **satisfied** with the response provided by the applicant subject to acceptance by and conditions as required by the EPA and NSW Health.

## 8. Road maintenance agreement

Council is **not satisfied** with the response provided by the applicant and reiterates its previous comments, being:

### Recommendation 15

Should development consent be granted Council requests:

1. That the Proponent be required to enter into a road maintenance agreement with Narrabri Shire Council.

## 9. Light at Siding Spring Observatory

Council is **satisfied** with the response provided by the applicant subject to acceptance by and conditions as required by the Siding Spring Observatory.

## 10. Social impacts on vulnerable groups

Council is **not satisfied** with the response provided by the applicant and reiterates its previous comments, being:

The Proponent acknowledges "The potential for localised inequality in the distribution of potential socio-economic benefits or impacts ..." (Santos NSW (Eastern) Pty Ltd, 2018, p. 5-145).

According to the Proponent, "*Social impact monitoring would be undertaken in line with the proponent's Social Impact Management Plan. Investment in social infrastructure and services will be provided through ... the Gas Community Benefit Fund ...*" (Santos NSW (Eastern) Pty Ltd, 2018, p. 5- 145).

Council is of the view that the Gas Community Benefit Funds should not be used to provide essential services and infrastructure but rather support improved economic and social outcomes for the community so that the people of Narrabri benefit from the Project not merely maintain the status quo.

The SRTS identifies that NSW Health did not raise social impacts on vulnerable groups as a concern in their submission dated 6 September 2018 on the RTS document. Subsequent discussions with NSW Health have indicated that they would not ordinarily provide comments on social impacts. Nevertheless, Council In this regard a revised recommendation 17 is provided for this issue:

### Recommendation 17

During the assessment of the application, Council requests:

That the proponent enter into a VPA with Council that reflects the socio-economic impacts in, and immediately around, the locality and provides a lasting net economic benefit to the locality, the wider Narrabri Shire.

## 11. Capacity of local waste facilities for waste salt

Council is **not satisfied** with the response provided by the applicant and reiterates its previous comments, being:

### Recommendation 19

During the assessment of the application Council requests:

That the EPA satisfies itself that the facilities to be utilised for waste salt disposal have long term capacity to accept it and adequate contingency planning is in place for disposal of waste salt.

## 12. Composition and classification of waste salt

Council is **satisfied** with the response provided by the applicant subject to acceptance by and conditions as required by the EPA.

## 13. Waste management

Council is **satisfied** with the response provided by the applicant subject to acceptance by and conditions as required by the EPA.

## 14. Independent monitoring

Council is **satisfied** with the response provided by the applicant subject to acceptance by and conditions as required by the EPA.

If you require any further clarification, please do not hesitate to contact Council's Development and Economic Growth Department on 6799 6866.

Yours faithfully,



Erika Dawson

**ACTING MANAGER PLANNING AND REGULATORY SERVICES**