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

Further to previous submissions Council makes the following submission in relation to the Narrabri Gas Project ("**NGP**").

Council supports the NGP subject to the following:

Monitoring of natural gas wells and gathering lines

- 1. That, if the NGP is determined by way of approval, a condition of consent be applied requiring:
 - a. That a long-term study dealing specifically with deterioration of CSG wells and assessing the impact of abandoned CSG wells over extended timeframes be undertaken to the satisfaction of the NSW Chief Scientist & Engineer.
 - b. That the Proponent pay for independent third-party monitoring of decommissioned coal seam gas wells.
 - c. That the monitoring be overseen by the EPA and results published on the EPA website.
 - d. That the requirement for monitoring continue until the NSW Chief Scientist & Engineer is satisfied, on the basis of evidence provided by a long-term study dealing specifically with deterioration of CSG wells and assessing the impact of abandoned CSG wells over extended timeframes, that the risk of contamination of water resource aquifers is negligible.

Reason: To ensure that decommissioned coal seam gas wells do not contaminate water resource aquifers.

Rehabilitation fund

- 2. That, if the NGP is determined by way of approval, a condition of consent be applied requiring:
 - a. The application of a three-layered policy of security deposits, enhanced insurance coverage, and an environmental rehabilitation fund or an alternative to the satisfaction of the NSW Chief Scientist & Engineer.







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Document Set ID: 1774319 Version: 2, Version Date: 28/04/2020 b. Publication of 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, including an explanation of the methodology used to determine that this amount is sufficient to ensure that no costs are passed on to the Public.

Reason: To ensure that the State holds sufficient financial assurance to cover the cost of rehabilitation and the Public are protected in the event of sudden accidental pollution caused by the Project and from unforeseen and long-term impacts of the Project.

Road maintenance agreement

3. Council has agreed in principle to the terms of a Voluntary Planning Agreement offered by Santos NSW (Eastern) Pty Ltd in the total amount of \$14.5 million, including a \$1.5 million Road Maintenance Agreement.

Social impacts

4. Council has agreed in principle to the terms of a Voluntary Planning Agreement offered by Santos NSW (Eastern) Pty Ltd in the total amount of \$14.5 million, including a \$13 million contribution amount.

Capacity of local waste facilities for waste salt

5. 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.

Kind Regards,

Daniel Boyce

Executive Manager Planning and Environment