



Stephen O'Donoghue
Team Leader Resource & Energy Assessments
Planning Services Division
Department of Planning & Environment
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Dear Stephen

RE: Narrabri Gas Project - Review of Response to Submissions

Thank you for your correspondence of 12 April 2018 inviting the Division of Resources & Geoscience (the Division) to comment on the Narrabri Gas Project (the Project) request for review of Response to Submissions (RTS) submitted by Santos NSW (Eastern) Pty Ltd (the Proponent) on behalf of its joint venture partners.

The RTS speaks to the comments provided by the Division during the exhibition of the Environmental Impact Statement.

The Division advises that the information provided in the Project RTS document lodged with the Department of Planning and Environment – Planning Services Division in April 2018 adequately addresses the issues raised in the Division's submission dated 24 May 2017.

However, the Division considers that the proponent's commitment within the RTS to consult with the Division's Geological Survey of NSW branch regarding potential biodiversity offset sites is ambiguous. The Division requests that it is consulted before offset sites have been finalised, to assist in the identification of areas that are not likely to impact or sterilise extractive, coal or other coal seam gas resources. Biodiversity offsets have the potential to preclude access for future resource discovery and extraction and could also potentially permanently sterilise access to mineral and energy resources.

The Division also requests that it review the draft development consent conditions prior to finalisation and any granting of development consent. This is to ensure obligations imposed on the mining lease (issued pursuant to the *Mining Act 1992*) and enforced by the Division over the life of the Project are consistent with the Consent.

Should you have further enquiries regarding this matter please contact:

Adam W. Banister, A/Senior Advisor (Resources Development & Operations),
Royalties & Advisory Services, (02) 4931 6439 or advisory.services@planning.nsw.gov.au.

Yours sincerely



16 May 2015

Chris Yeats
Executive Director
Geological Survey of NSW
Division of Resources & Geoscience