From: Theo Polizogopoulos
Sent: Wednesday, 28 January 2026 4:36 PM
To: Rose-Anne Hawkeswood
Cc: Brittany Golding
Subject: RE: Narrabri Gas Lateral Pipeline EIS - DCCEEW Comments
Importance: High

Dear Rose-Anne,

Thanks again for reaching out to us on this one.

Our pipeline subject matter experts have conducted a preliminary review of the EIS for the Narrabri Lateral Pipeline project and provide the following feedback and comments for your team's consideration;

1. It appears that the route selection is driven by constructability rather than risk avoidance. It would be great if Santos can provide more details on how environmental sensitivities influenced the final alignment of Narrabri lateral Pipeline.
   a. It would be interesting to get Santos' feedback on whether alternative routes were considered to avoid environmentally sensitive or high-risk areas (e.g., wetlands, landslide-prone terrain, corrosion-prone soils).
   b. Does the finalised route cross protected habitats, drinking water catchments, unstable land (e.g. slopes, ravines, escarpments, etc), or floodplains where a pipeline failure would have disproportionately severe impacts? If so, what measures does Santos intend to take to control this risk?
2. The EIS references geohazards broadly but lacks any site-specific studies undertaken to demonstrate that long-term integrity risks are acceptable. In this regard it would be interesting to get Santos' views/feedback on the following queries;
   a. Have geotechnical hazards such as landslides, subsidence, erosion, scour, and seismicity been fully assessed?
   b. Has soil aggressiveness (corrosivity) analyses been completed along the alignment?
   c. Do any of the environmental constraints increase exposure to geohazards that could compromise pipeline integrity?
3. Does the flood modelling conducted by Santos includes climate change-adjusted rainfall intensities? This becomes important for pipeline stability under future extreme events.
   a. Confirm with Santos if hydrological models have been completed or will be completed for all major water crossings along the route.
   b. Check with Santos if the pipeline design protects the pipeline from erosion, scour, and buoyancy uplift during flooding events (particularly along water crossings).
4. The EIS does not provide a scenario-based analysis showing containment effectiveness and response timeframes for gas releases. In this regard we'll be interested in having Santos comment on the following,
   a. Does the EIS quantify environmental impacts of a worst-case leak or rupture?
   b. Are plume dispersion models included where applicable?
   c. Will access be available for emergency vehicles year-round along the entire route of the pipeline?

Should you include any of these comments in your request for Santos to respond to submissions, we would kindly request that you share their responses with our team where possible.

Regards.

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