

Narrabri Gas Project lateral pipeline

The NSW Government is strongly pushing for this project because of recent comments made by Premier Minns at the recent 'National Energy Forum' run by The Australian, that the Santos Narrabri Gas project must 'go ahead'. This is incredibly disappointing and casts doubts on whether this will be a fair and objective submission process, where those that object to this project will have their views considered if at all. Is this just a process to 'tick-a-box' to say that the public has been consulted, yet the decision has already been made. We hope not as our voices and objections should be respected as valid concerns that arise if this project goes ahead.

As you are aware, Gomeroi Traditional Owners, local farmers, Unions NSW and thousands of concerned people across the state have been fighting to stop this project. It's well documented that this project poses **unacceptable risks** to people's health, the Great Artesian Basin, Gomeroi Country including the beautiful Pilliga Forest, prime farmland and the climate.

The government refuses to listen to these voices as if they do not matter, and describe the project as "incredibly important" for NSW and claim it 'could' provide "half our gas needs," while claiming new gas is needed to "keep the lights on." This is a convenient government led 'greenwashing' statement to create a sense of urgency to action something that has a hidden agenda that ultimately will not help the community but harm them.

The real truth is-

- 1. Gas from Narrabri won't guarantee supply or lower prices.** Australia is already one of the world's biggest gas exporters yet prices here remain among the highest because companies like Santos sell into the global market instead of reserving gas for domestic use. How does your argument benefit NSW residents? The government benefits but not the consumer as the gas heads offshore! The government is encouraged to be truthful to the consumer on whether there will be readily available gas and will it be cheaper. Other regulations within the supply chain of gas for domestic markets will also need to be adjusted.
- 2. Narrabri won't deliver secure jobs or economic benefit.** These companies export massive quantities of gas offshore, don't pay tax and are driving manufacturing out of the country. Unions representing nurses, doctors, teachers and academics have consistently opposed the project, warning it threatens our health, our water and our climate while doing little for domestic jobs or supply.
- 3. The risks are enormous.** The Lateral Pipeline project is linked and connected to the Narrabri Gas project. The two are related and cumulative damage will occur. I strongly oppose the Narrabri Lateral Pipeline because of its direct damage but also because it connects to the Narrabri Gas Project that will also have negative ongoing impacts for nature and people. You cannot discuss one project in isolation without referring to the other project. You approve one then you approve the other and its accompanying disadvantages. The pipeline alone will cross through 12 farms, and a little under half the land it will disturb is agricultural land, and one fifth of the land to be disturbed is cropping land. The other half of the pipeline cuts through the Pilliga Forest, an important conservation area established in 2005. Santos also wants to drill 850 coal seam gas wells in the Pilliga Forest, threatening the **Great Artesian Basin**. The Narrabri Gas Project is located within a key recharge zone of the basin that farmers and towns depend on for water. Another reason to refuse this project is the massive drilling that could risk inducing earthquakes, subsidence and other mass movements if existing faults were exacerbated or the geological stability of the site was otherwise weakened.
- 4.** The future of Santos' \$3.6 billion Narrabri Gas Project may depend on the approval and construction of a controversial **carbon capture and storage (CCS)** project that could impact the **Great Artesian Basin**, according to newly released documents obtained under freedom of information. Santos does not want the public to know about their intentions and the ramifications for the negative impacts to the Great Artesian Basin. The documents (GIPA doc 1, page 3) suggest Santos was considering CCS in NSW in order to comply with the Federal Government's Safeguard Mechanism and its own emissions

reduction **target of net zero by 2040**. It seems that conversations between the NSW Government and Santos are to ensure that this major project gets the 'green light' to proceed with the help of the state government to comply with the federal government's own parameters. Santos is trying to make its own company policy fit with federal Safeguard Mechanism laws with the NSW Government's help! It is abundantly clear that this project is being supported strongly by the Minns Government.

Carbon Capture Storage (CCS) has never worked at large scale to completely offset the 127 million tonnes of greenhouse gas emissions that the Narrabri Gas Project is expected to create. Added to this dilemma, Scope 1 & 2 emissions are only included as CCS fails to address Scope 3 downstream emissions. Even though this project is a decade in the making Santos has only recently realised it needs to do something about the significant emissions it would produce. This suggests that Santos is still a long way off making any final investment decision on the Narrabri Gas Project- so why are we having a submission process on a NSW Major Project that is not ready?

5. Santos is still **awaiting final decisions** for its Narrabri Lateral Pipeline (gasfield to Narrabri), its Hunter Gas Pipeline (QLD border to Newcastle) and the Hunter Lateral Pipeline (HGP to existing pipeline network).
Santos is still to reach access agreements with up to 174 landholders along its Hunter Gas Pipeline route. Premier Chris Minns declaring the government was willing to consider *compulsory acquisition to force landowners to allow a pipeline* on their private land for the Narrabri gas project, and urged Santos to commit to the investment. This suggests strong government interference in getting this project approved.
6. This **major project** will also trash culturally significant Gomeroi Country, and Gomeroi Traditional Owners who have overwhelmingly rejected it over the past decade. Gomeroi Traditional Owners have successfully appealed the decision made by the Native Title Tribunal (NTT) who failed to consider the environmental impact of the project in light of climate change. NTT should have taken climate impacts into consideration when considering whether it was in the public interest. The Federal Court has since allowed the appeal because the NTT had erred in interpreting and applying 'public interest' requirement under the Native Title Act 1993. On 24th November 2025 (3 weeks ago) Santos now faces a four-month delay in a Federal Court ruling on an appeal to the Native Title Tribunal's clearance of its Narrabri gas project in NSW. This will further slow progress on this project. The delay means the appeal brought by the Gomeroi people is now expected to be heard in March 2026. The Gomeroi traditional owners are set to argue that the Native Title Tribunal did **not** give sufficient weight to the effects of the Narrabri project on climate change and native title rights, and that the project's emissions would worsen climate change, impacting their health, way of life and the land.
7. The Narrabri Gas Project is located within a key recharge zone of the basin. Thousands of farmers and many towns including Moree rely on the Great Artesian Basin for water. Similarly, the risk to the Great Artesian Basin was one of the principal reasons Glencore's proposed Queensland carbon capture and storage project was rejected last year, because it would affect the water quality, including acidification of groundwater and hazardous inorganic elements into groundwater resources. The NSW Minns Government must not entertain any such destructive proposal in NSW. On this reason alone Santos Narrabri Gas Project and its Lateral Pipeline **MUST** be rejected. ***If it was bad for Queensland and recognised as such, it is also bad for NSW and MUST be rejected!***
8. **Water Trigger was not applied.** Federal Court ruling on the Narrabri Lateral Pipeline on the 4th December 2025 means a major gas infrastructure in this case will proceed without proper assessment of its impacts on water. The environment minister should have applied the national 'water trigger' to the Narrabri Lateral Pipeline. This is a clear error of judgement. The Narrabri Lateral Pipeline is a proposed 50-60 km underground gas transmission pipeline in north-western NSW intended to connect Santos' approved 850-well coal seam gas field to the Hunter Gas Pipeline and the broader east-coast gas market. The pipeline would cross Gomeroi Country, productive agricultural land,

the Bibblewindi and Pilliga Forests, raising concerns about potential impacts on the Namoi River catchment and the Great Artesian Basin. The water trigger should have been implemented to properly protect the environment particularly the Great Artesian Basin. Our environmental laws have failed as loopholes were exploited again by industry and supported by governments.

9. **Better, cleaner, cheaper alternatives exist!** Independent experts and the Net Zero Commission have warned that new gas projects will pose a major challenge to ensure NSW reaches net zero. This project jeopardises the state's climate targets. So this action of approving a gas project with such high emissions works contrary to the NSW Government's net zero targets. This does not instil trust by the community that this state government are genuinely committed to renewables. Renewables with storage are already the cheapest form of new power and they can deliver reliability without sacrificing climate and Country. Nature does not have to die to reach net zero!
10. Premier Minns has said, "People should understand that at the moment we import gas into NSW despite the fact it's under the ground in our state already." As it is in our ground it belongs to NSW and the people. We should not be importing our own gas. This situation is absurd and should be rectified. We already have enough gas and coal projects in NSW. So legislate that some of this gas stays in NSW for consumers. There should be restrictions on exports. Why do we have to open up another fossil fuel project because our legislation is faulty? Additionally the Australia Institute estimates state and federal governments have missed out on \$13.3 billion of royalty revenue that should have been charged on gas exports during the past four years. Gas exported from six of Australia's 10 LNG export facilities **pay no royalties** on the gas they sell overseas. Have discussions at a federal level to fix this legislation and an absurd situation that will begin to prioritise the NSW community rather than industry. Get these companies to pay their royalties. We cannot keep on destroying our natural environment whilst companies reap huge monetary benefits and also export our own gas. They are exploiting us and our country and getting away with it!
11. Construction of the piping network will clear 168 hectares of the **Pilliga forest** and will cut a 30 metre wide swathe through the Pilliga East forest, causing serious damage for microbats and small mammals. Bats are essential in seed dispersal and maintaining healthy flora levels so this will affect the health of this ecosystem. It will also clear habitat and put at risk threatened species that have strongholds in the Pilliga, like the Pilliga Mouse (Vulnerable), Eastern pygmy possum (Vulnerable), and Corben's Long-eared Bat (Vulnerable). Pilliga Forest is an iconic Australian landscape offering rugged beauty on a grand scale. One of the iconic landscapes of inland Australia, Pilliga Forest is made up of Pilliga Nature Reserve, Timmallallie National Park, Pilliga West, and East State Conservation Areas. The destruction of endangered woodland will negatively impact the survival of **critically endangered Swift Parrots and Regent Honeyeaters**, and endangered Bush- Stone Curlews. The most recent published population estimate of Swift Parrots (in the Action Plan for Australian Birds 2020) was 750 individuals and less than 400 Regent Honeyeaters that exist and that was 5 years ago. These birds depend on the Pilliga to survive and the Narrabri Project (Pipeline and Gas) will destroy their habitat. Why have a state NSW conservation effort that is already established to save these birds and yet approve a project that will cause their decline even further leading to their extinction?
12. The Pilliga Forest is one of eastern Australia's last great inland forests and a place of deep cultural and spiritual significance for the Gomeroi people who are fighting legally in the court to uphold their voices. Yet the NSW Labor Government is still allowing Santos to push ahead with the government's encouragement to wave this destructive Narrabri Gas Project and the Pipeline through that will threaten the survival of the Pilliga forest, its wildlife, water, and cultural heritage. There are pending approvals from 174 landholders to have gas pipelines on their property, pending approvals for the pipeline network to run across regions in NSW and a decision still pending next year on the Gomeroi People who are appealing the Native Title Tribunal (NTT) decision because of climate impacts to their Land that were not considered.

Because there are still approvals pending including this legal case next year we question the validity of this submission process as it stands now. Should we be having a submission process when so many issues are not resolved. I am troubled and concerned that there is an unfair use of power by the government to achieve their goals and agenda as they want it passed no matter what, as it has already been determined as a State Significant Infrastructure.

Granted there is a legitimate concern for the state's future energy needs but opening up another gas project to exacerbate further environmental and climate damage is **not** the answer. Fix current legislation that allows the current gas companies to export our own gas with mandatory requirements to keep a percentage free from export to stay in NSW. Invest more in renewables and fast track this industry to supply clean energy. These should be the solutions, not opening up a destructive pipeline and gas project by Santos.

There is a strong and growing movement across unions, communities and climate groups calling for this project to be stopped which has been ongoing for more than a decade. Because it will cause so much harm to climate and nature the community and the wider public will continue to oppose it. We would hope the government would support our concerns but sadly they are strongly connected to fossil fuel- gas and in this case it is a misplaced support. This project **MUST** be rejected completely.

Thank you

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