

“Narrabri not the best solution for eastern Australia’s gas supply”

The Institute for Energy Economic and Financial Analysis, September 2025:

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Context

The proposed Narrabri Lateral Pipeline (NLP) project will carve a 20-to-30 metre corridor for over 50 kilometres, with its path heading through pristine sections of the Pilliga forest, private properties, and public land. Santos want this project approved so they can connect 850+ new gas wells. These wells will be drilled through the unique and irreplaceable Great Artesian Basin which is essential for life in the area.

In 2024 public feedback was sought as to whether the NLP should be a controlled action under the Environment Protection and Biodiversity Conservation Act 1999. In February 2025 the Federal Minister's delegate found the Narrabri Lateral Pipeline was indeed a "controlled action" and thus the pipeline proponent (Hunter Gas Pipeline P/L who is owned by Santos) would be required to prepare an Environmental Impact Statement (EIS) for public comment which addresses both Commonwealth and State matters.

Santos' EIS documents for the Narrabri Lateral Pipeline were first made available for comment on 20th November 2025, with submissions closing on 18th December 2025.

I am a private citizen and our family owns a rural property on the path of the proposed HGP. The volume of documentation placed on exhibition and the meagre 28 days allowed for comment means I have only been able to review a portion of it. However, from my reading I believe the EIS documentation is materially incomplete, often incorrect, and clearly biased.

I strongly object to the Narrabri Lateral Pipeline project proceeding. My main reasons are documented below.

Key Points (TL;DR)

The key points raised in my response:

- The release of the EIS is premature and it should be withdrawn until it has been completed. In Santos' own words "**Santos is continuing to conduct supplementary field surveys to address data gaps where survey has not been completed**". Another result of the EIS' premature release are cross-references within the documents that lead nowhere;
- The fauna and flora studies are incomplete;
- The exhibition period allowed for public review of the EIS is totally inadequate. There are 45 documents containing nearly 3,500 pages and the public has been given less than a month to review these. This is grossly unreasonable, and the review should have been extended to at least 12 weeks to allow proper review and elicit comprehensive responses;
- The EIS response to the pipeline's likely impact on property values is derisory and insulting;
- The EIS is still relying upon numerous desktop surveys - these have been repeatedly proven to be unreliable;
- The EIS fails to adequately cover flood risks after construction;
- The proponent has not demonstrated a comprehensive end-of-life plan for the proposed pipeline. After 30 years the pipeline operator could walk away from the project, or divest it to a 3rd party, which will pose a significant financial and social risk for State and Federal governments, and has serious impacts for landholders;
- There is no social licence for this project, e.g. landholders throughout the path of the Hunter Gas Pipeline are adamant there will be no access to their land for this purpose;
- Community values have changed and public sentiment has turned against the ongoing use of fossil fuels. The NLP project is not needed as there is ample gas already available in Australia to meet all current and predicted requirements. Any gas shortages NSW faces are mainly a result of Santos' historically poor and greedy business decisions, and Santos should not be further rewarded for plundering Australia's domestic gas supply;
- The Prime Minister has acknowledged that new gas fields are not needed for electricity "firming";
- The International Energy Agency (IEA), the United Nations (UN), and the Intergovernmental Panel on Climate Change (IPCC), have stated that there can be no new global investments in coal, oil, or gas projects if the world is to reach net-zero emissions by 2050;
- At COP30 in Brazil, Australia signed the Belem Declaration to Transition Away from Fossil Fuels. Developing the Pilliga gas fields is completely contrary to this declaration;
- In 2022 the United Nations General Assembly declared that everyone on the planet has a right to a healthy environment; and
- In 2025, the International Court of Justice (ICJ) issued a major advisory finding that countries failing to act on climate change could be breaching international law, which has opened the possibility that a UN Special Rapporteur may intervene in climate litigation cases involving the Pilliga gas fields and the pipelines associated with it.

There is a very strong case for cancelling this project and instead spending the time and money focusing on accelerating renewable energy projects.

I sincerely hope the NSW Government can final stop being bullied by Santos and the fossil fuel industry, and that it has the vision, bravery, and resolve to cancel this project.

Landholder Feedback

Data gaps - the release of this EIS is premature

Within “Technical Report 1a - BDAR - Main Report” there are twenty (20) occurrences of the phrase ‘data gaps’ e.g.: “*Santos is continuing to conduct supplementary field surveys to address data gaps where survey has not been completed*”.

This is a clear admission that the Santos has rushed out an incomplete document.

It is possible they hoped that such a voluminous document will only get cursory examination during the brief public exhibition period (particularly as it is nearing Christmas), or the rushed to get it out ahead of the findings of the Federal Government’s Gas Market Review.

Other evidence of its premature / rushed release is evident. For example, I noticed the documentation sometimes makes references to other parts of the EIS which are either incomplete or incorrect i.e. if you follow some cross-references they take you to an irrelevant section, or back to where you started.

Below is an example from a topic I was particularly interested in:

In “Appendix E - Community and Stakeholder Engagement Report” Page 11 it notes one of the ‘*Key concerns that landholders have raised include*:’ ... ‘*impacts on property values*’.

The next mention of “property values” in Appendix E is in a table on page D.8 where - for some weird or nefarious reason - the proponent has decided to combine it with a very different key concern i.e. it says ‘*Impact on properties, including private dwellings and farm infrastructure such as dams, and impacts on property values*.’

The “*Project Response*” column makes no mention of property values.

The “*Where Addressed*” column refers the reader to Technical Report 7 and Chapter 11.

Technical Report 7 mentions property values as a key concern but does not address it.

Chapter 11 does not even mention property values.

Thus the reader is left lost and unadvised as to Santos’ view of the likely impact of the project on property values.

A cynical mind might feel that perhaps this is because the proponent is not keen to address this concern when landholders could potentially be facing capital losses of hundreds of thousands of dollars... but it seem more likely to be poor quality, rushed documentation.

This is just one example that was identified in just a few of hours of reviewing, so it seems probable that there many others. The NSW Government and the public cannot feel confident in the quality of this Environment Impact Study if it is not complete and accurate.

The fauna studies are incomplete

Whilst the EIS contains hundreds of pages of text regarding the flora and fauna that will be impacted by the pipeline, a cursory glance indicates that there are still gaps in its approach (in addition to Santos' admission of data gaps, as noted above).

For example:

The '*Technical Report 2 - Aquatic Ecology*' repeatedly refers to reliance upon desktop reviews to identify key fish habitats – refer to the "*Continued reliance on desktop studies*" section in my response below for a lagoon image that demonstrates that desktop reviews are very unreliable in relation to the waterways that will be found when real field surveys are undertaken.

Additionally, the noted aquatic habitat field surveys - aka "ground truth" – each took place on just a single day (and all within 2 days of each other in August 2025). This approach has next-to-zero chance of being able to represent and assess the wildlife that lives in or relies up that waterway over the course of a year. The EIS should have included at least 12 months or more of aquatic observations for every waterway along the NLP's path, as well as covering nocturnal and diurnal surveys.

Similarly, many of the other fauna surveys took place over only a handful of days, and none were undertaken in 2025 when there were significant flooding events. Fauna and flora fluctuate considerable over time, with seasonal and climate factors (such as droughts and floods) having a significant impact on what surveys will find. Our own rural property on the Liverpool Plains is currently a haven for water-birds (pelicans, spoonbills, ibis, herons etc.) following substantial floods in August 2025 whereas in drought years a survey might find very few aquatic birds.

As for Santos' approach to endangered wildlife, consider "*Tylophora linearis*". A Freedom Of Information request earlier in the year made available the "*Referral Decision Brief*" document for the Federal Department of Climate Change, Energy, the Environment and Water. This document singled out "*Tylophora linearis*" as being one of the Endangered species impacted by the NLP.

It is thus worth looking at how Santos addressed this species in the EIS' Technical Report 1 - Biodiversity development assessment report (main report). Santos identifies that there will be the "*removal of 61.5 hectare of habitat for Tylophora linearis*" and admits "*The project is considered to have the potential for a significant impact on the following species listed under the EPBC Act: ... Tylophora linearis ...*".

And the proposed solution? Simply add in 2,087 species credits to offset the *Tylophora linearis* loss.

Species credits do not replace the unique habitat needed by rare and endangered flora and fauna. Instead, such sites should be left in pristine condition to allow such remnant populations to flourish.

The NLP project will rip a wide corridor through pristine forests, waterways, and mature agricultural land and ongoing easement clearance will prevent nature restoring the habitat.

So the EIS survey approach must be complete and comprehensive, and it must offer a better approach to preserving Australia's endangered wildlife.

The public review period is totally inadequate

The EIS provided by the proponent was provided in 45 documents which contain over 3,400 pages of text and maps.

Whilst it is of merit that the NSW Government has made the EIS available for public comment, the 4-week period that has been allowed to people to review, analyse, and comment is grossly inadequate as it does not allow for proper public scrutiny of such an important document. The NSW State Significant Infrastructure (SSI) website states an EIS “must be exhibited for *at least* 28 days.”, but it does not limit it to 28 days.

In order to allow proper scrutiny and to elicit quality responses from the public it would be have been fairer and more reasonable and thorough to ensure that the exhibition period is commensurate with volume and complexity of material that needs to be reviewed.

Additionally, the format of that the documentation provided did not allow reviewers to easily copy text - this has made it even more time-consuming and laborious to review and provide comment.

Given the massive challenge for any individual to read and digest 3,400+ pages of technical information, and to thoroughly identify gaps and issues contained within the documentation, an exhibition period of at least 12 weeks should have been provided.

Gas supply issues

It is both sad and ironic that "*Appendix C - Strategic planning review*" document repeatedly refers to potential supply gaps for gas without also acknowledging that Santos itself holds a considerable amount of responsibility for this situation.

The Federal Government has been undertaking a “Gas Market Review” with new policies expected to be announced before the end of 2025. It has been identified that Santos’ decision to build two export lines for its Gladstone Liquified Natural Gas terminal instead of one, and the consequential need for Santos to buy up massive volumes of uncontracted gas supply to satisfy its highly-profitable export market, have forced domestic shortages and have forced prices up.

It is expected the Federal Government will implement a new gas reservation policy which would help alleviate the choked supply and reduce prices.

In addition, the east coast of Australia already has the Port Kembla LNG terminal as an alternative means to bring in additional gas supply without needing to build hundreds of kilometres of pipeline which will wreck the physical environment.

Pilliga gas is not needed. Australia already produces ample gas, but too much is currently exported.

Impact upon property values

Following on from an earlier point, many of the landholders impacted by the proposed pipeline are, understandably, very concerned with the impact on property values of hosting a high-pressure gas pipeline. They are also worried that compensation will be woefully inadequate for the disruption, destruction, and ongoing stigma and issues that hosting a large gas pipeline entail.

I therefore persevered with searching for more information within the voluminous EIS regarding this topic, and finally stumbled across section 7.1.2 in Technical Report 11 (a section unreferenced in Appendix E - Community and Stakeholder Engagement Report.) This says:

'A small number of landholders raised concerns during consultation with Santos about the perceived impact of the project on property values. An extensive literature review undertaken in 2012 into the impact of proximity to natural gas pipelines on property values concluded that there is no systematic evidence, based on actual sales data, that proximity to pipelines or pipeline ruptures reduces property values (Wilde, Loos & Williamson, 2012). Given property prices are influenced by, and can fluctuate due to various contributing factors, and the findings of the 2012 study, an assessment of impacts on property values resulting from the project is not within the scope of this assessment.'

In other words, Santos have just chosen to wash their hands of this topic, and they appear to have based their approach on a single American study from over 10 years ago which has no relevance to today's realities.

This is cynical cherry-picking in the extreme. It is a convenient attitude for Santos to take, but it has a potentially devastating impact on landholders.

A more thorough and balanced approach would have revealed numerous other studies which concluded that the fear and stigma of the presence of a high-pressure gas pipeline does materially affect property values.

Here are some comments from a different American study (Kielisch):

"Over 75% of realtors viewed the pipelines as a safety risk..."

"A survey of buyers with the choice of buying a house encumbered by a 36-inch diameter pipeline showed that 62% would not be interested at any price"

"Considering only those buyers who are still willing to purchase the property, the expected loss in market value would be 10.5%"

And from an article on the ScienceDirect web site:

"... just the announcement of a proposed pipeline in NY showed to impact negatively property values by 9% (Boslett and Hill, 2019)."

There is no doubt that there will be a loss in property values. It is basic common sense.

Ask yourself - given the choice of two properties, would you preference the one without a pipeline... or would you choose the one that has a 30m wide easement which (a) restricts farming activity, (b) contains a shallowly buried, potentially explosive, high-pressure gas pipeline, and (c) may have long term erosion and subsidence issues?

The loss of property values is an important topic that needs addressing in balanced and fair way within the EIS.

Continued reliance on desktop studies

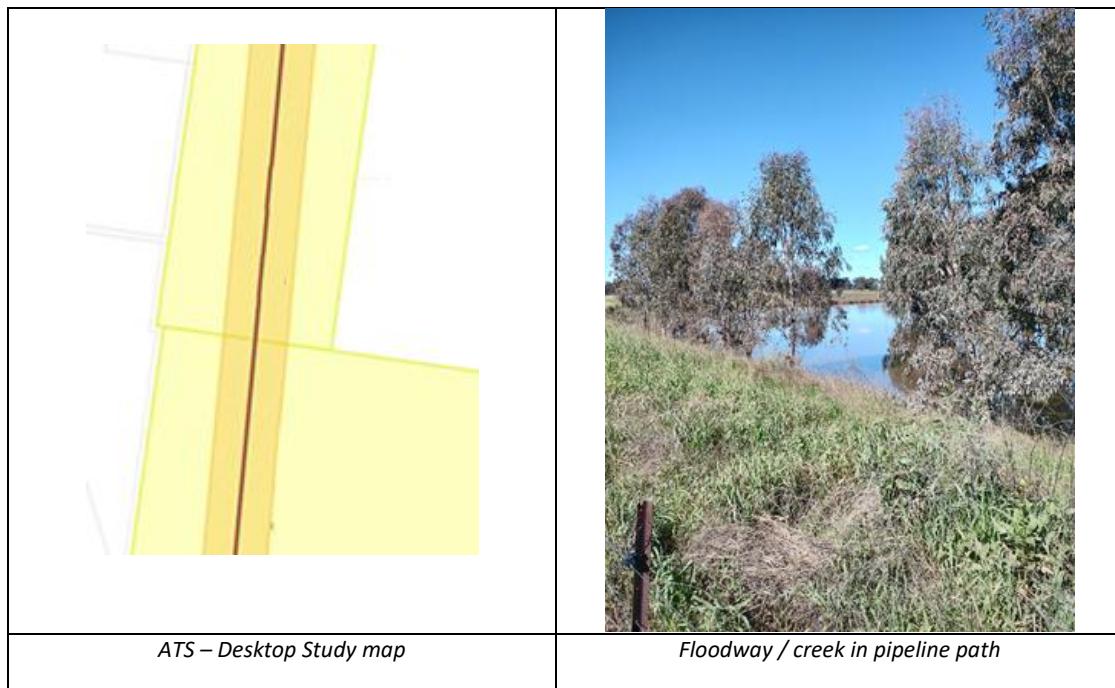
The EIS documentation makes numerous references to desktop studies.

Desktop studies are not a suitable tool for a detailed analysis of the flora and fauna and landscape that will be encountered along the proposed path of the pipeline.

For example, the “desktop study” map on the left below shows a page from the Hunter Gas Pipeline’s Authority-To-Survey document.

The desktop study map purports to show that there are zero waterways on the property.

The image on the right shows an August 2025 “on the ground” photograph of a 2m deep floodway lagoon / creek that the pipeline will have to cross, a natural floodway creek that a “ground truth” survey would have revealed.



Such gross errors strongly imply that any EIS that relies on desktop studies is likely to be deeply flawed.

The whole of the length of the NLP path needs to be fully surveyed on the ground to document all waterways and to identify all “at risk” flora and fauna.

Inadequate addressing of post-construction flood risks

Technical Reports 3a and 3b claim for cover the risk of flooding. Unfortunately Santos has mainly focused on the short construction phase, and not the long-term post-construction risks.

Within these documents there is a paragraph titled '*Impacts from the project during operation*' which boldly, optimistically, and incorrectly asserts '*the project is unlikely to result in flood impacts during operation*'.

Later in section '*3.3.3 Operational assessment*' it states '*Operational flood modelling has not been undertaken as the project includes minimal surface infrastructure with the potential to affect flood behaviour. A qualitative assessment of potential flooding impacts is provided in section 5.2*'

In Section 5.2 and elsewhere, the EIS claims that there will be negligible because - after removing vegetation, ripping a 20m-to-30m corridor through the landscape, and burying a 50cm pipe less than 1m underground – the impacted land and water-crossings will be '*re-contoured to match the surrounding landform and drainage patterns*' and above-ground equipment removed. Elsewhere in the EIS document it states "*The remaining disturbed areas would be allowed to naturally regenerate*".

Anyone who has farmed on the Liverpool Plains and other areas susceptible to flooding knows that "re-contouring" is totally insufficient. If you disturb the land and there is a flood then you will lose soil and you will have erosion unless the soil is (a) correctly compacted and (b) there is sufficient *mature* plant cover.

A clear demonstration of severe post-construction erosion occurred at nearby Coolah in 2010 where tonnes of soil were washed away, as shown in the photograph below:



Coolah NSW, 2010 - Image from Lock the Gate website

Flood modeling for the operational phase of the project must to be undertaken and included in the EIS.

The documentation must also clearly identify how any flood-related subsidence or erosion (both surface and subsurface) will be (a) mitigated against and (b) rectified without cost and risk to landholders.

Impact upon property insurance

Several insurance companies have declared that they will no longer offer Public Liability insurance if a property hosts any type of Coal-Seam Gas infrastructure.

The Queensland and New South Wales governments are aware of this problem.

So if the NLP project is allowed to proceed, how will the NSW Government provide Public Liability insurance for all the landholders forced to host the pipeline? Or will Santos be made to cover Public Liability insurance risks for all properties the pipeline passes through? Is there a plan?

End-of-life and abandonment

Chapter 3, section 3.8 provides some documentation about the anticipated end-of-life process for the pipeline (which could well be within the next 20-30 years). It states:

It is anticipated at this point in time that decommissioning would involve retiring the pipeline, with the majority of the underground pipeline expected to remain in place. Leaving the pipeline underground minimises the need to disturb land and re-establish vegetation, which would be required to excavate and remove the pipeline.

Firstly, leaving the pipeline in the ground is mainly for the benefit of the pipeline operator, not the landholder, because this is much cheaper for Santos than removing the pipeline and “making-good”. Leaving a 50cm tube buried less than 1 metre underground will have ongoing impacts and risks for the landholders. A simple example - a fence strainer post typically goes at least 1.2 metres into the ground which means a farmer cannot use this land freely. Also, an empty metal pipeline buried underground will eventually collapse or puncture which will lead to subsidence and erosion.

Thus the pipeline company should be made to either remove it or fill all of the pipeline once it is no longer needed, and this approach must be documented in the EIS.

Secondly, the documentation assumes there will be an orderly end-of-life process for the pipeline, but what happens if the operator walks away and abandons the infrastructure because it is not financially viable for them to maintain it?

Alternatively, Santos may choose to sell the pipeline after, say 20 years, in order to avoid having to clear up its mess. This may sound unlikely but Santos has recently sold its share of two other projects, and one of the reasons provided was that this action “*reduced Santos’ future decommissioning exposure*”.

Who will be responsible for “making good” in such circumstances? It seems likely that the NSW State or Federal Government will have to pick up the tab – or will landholders be left carrying the can for the degraded and unsafe landscape?

The proponent must be made to insure against abandoning the pipeline e.g. by providing a suitable financial bond to cover the future cost of correctly “making good”.

Estimated Development Cost

The EIS contains a document called “Estimated Development Cost”. Within this document it states:

Land Acquisition

Land acquisition is excluded from the estimates.

There is no explanation provided – so why is Land Acquisition excluded from the estimates? This is likely to add up to a multi-multi-million-dollar figure across the length of the NLP and HGP pipeline paths.

Greenhouse Gas emissions

Chapter 18 purports to address the Greenhouse Gas emission impacts of the proposed NLP project, but it is incomplete.

For example, the “18.4 Decommissioning impacts” section claims the only sources will relate to diesel fuel and residual gas management. This contradicts Chapter 3, section 3.8.2 which identifies that:

‘sections of the pipeline may be cut, capped and filled to prevent subsidence, which could involve excavating an access hole (known as a ‘bell hole’) at either end of the section to be filled’

Whilst the filling material is not specified in the EIS, it appears that concrete is a typically industry choice. Some basic research indicates that the production of concrete accounts for 6-8% of global CO2 emissions thus there should be a significant greenhouse gas allowance included for this source.

Leaving an empty pipeline underground should not be an option as it will lead to ongoing issues with subsidence and collapse. Therefore, the EIS analysis should have included a substantial emission allowance for filling the abandoned pipeline.

Secondly, the NLP project’s EIS is ignoring the consequence of Scope 3 emissions. I acknowledge that the Wilga Park Power Station is already connected to the Pilliga gas fields, but its gas consumption is approximately just 4 terajoules per day sourced from a handful of appraisal wells.

Whereas Santos have indicated that their Hunter Gas Pipeline may transport up to 200 terajoules of fossil gas per day which will have a significant environmental impact, and there is a direct correlation between the NLP project and these emissions.

Put simply, if the NSW Government cancels the NLP project then it will prevent 200 terajoules per day of gas being transported and used, a scenario which will have no Scope 3 emissions.

Ipsa facto, if the NLP project is allowed to go ahead then there will be Scope 3 emissions for 200 terajoules per day of gas, and these must be counted by the project.

Recently, the NSW Government’s Net Zero Commission has found the expansion of coal mining in the state would be inconsistent with emissions reductions targets. The same applies to expansion in the extraction of any fossil fuels.

No social licence for this project

The Pilliga Gas Fields were approved over 15 years ago. Based on quick research, the Pilliga gas field project’s EIS had around 23,000 of which 98% were against it.

Since then, community expectations against allowing new fossil fuel projects have grown increasingly strident.

The Hunter Gas Pipeline is facing strong community resistance, with around two-thirds of landholders refusing Santos’ request to access their properties.

The Gomeroi people, whose unceded land the pipeline would cross, are strongly against the project.

Multiple Trade Unions are against the project.

There is no social licence for this project to proceed. It should be cancelled now.

Public sentiment is against gas projects – it is not needed

The world has changed in the 16 years since the Pilliga gas project was first promoted. There is an accelerating push to produce energy through renewables. Any fossil gas needed for specific industries can be sourced from existing gas fields. Even the much touted “*we need gas for electricity firming*” is rapidly fading with massive batteries providing the ability to store and release renewable power faster and safer. Even the Prime Minister has acknowledged gas is not the needed for this.

Australia has ample gas, but we export too much of it. As noted in a recent ABC News article:

The problem stems from a catastrophic decision from Santos a decade ago to double the size of its export plant even though it had insufficient gas reserves.

When it discovered it was short of gas, Santos decided to plunder the domestic market. And it continues to do so. It draws gas from the domestic market and ships it offshore, leaving barely enough supplies to power the nation.

Proceeding with the NLP project benefits Santos, and Santos should not be rewarded for poor business decisions 10 years ago and for plundering Australia’s domestic gas reserves.

The majority of the Australian public supports net zero, and expanding fossil gas extraction flies in the face of this sentiment. The gas under the Great Artesian Basin in the Narrabri area needs to stay in the ground.

Lack of balance

Throughout the EIS document there is a lack of balance in Santos’ statements and referenced articles.

For example, in “Chapter 2 - Strategic context” Santos has cherry-picked the official reasons why they feel the project has merit.

Instead, for balance, they should have referenced other contrary opinions such as the Institute for Energy Economic and Financial Analysis (IEEFA)’s recent article titled: “*Narrabri not the best solution for eastern Australia’s gas supply*” which included key points such as:

Narrabri gas is likely to be one of the most expensive sources of gas in eastern Australia, with estimated production costs 45% higher than for existing gas fields in Queensland.

Gladstone LNG has sufficient gas reserves to meet its export commitments and should be incentivised to develop these reserves before tapping the domestic market.

Santos has not clarified whether Narrabri would simply displace some or all of its domestic gas supply from the Cooper Basin, which could drive domestic prices up.

Or Santos could have quoted the Prime Minister’s comments from November 2025 to the effect that Australia has enough existing gas supply to meet domestic “firming” needs for its electricity grid, suggesting that no new gas fields are necessary for this purpose alone.

Or perhaps the article in The Conversation in November 2025 which stated:

In July 2025, the International Court of Justice (ICJ), the world’s highest court, delivered a landmark legal opinion. It found countries must act with “due diligence” to prevent significant harm to the climate system. This includes considering the climate harm caused by fossil-fuel production. They must also consider emissions released when fossil fuels are exported and combusted (known as downstream or Scope 3 emissions).

The EIS should offer a balanced view – it does not.

The project is contrary to Australia's international agreements

There are numerous international agreements and legal decisions that impact the proposed NLP project. For example:

- At COP30 in Brazil, Australia signed the Belem Declaration to Transition Away from Fossil Fuels. Extracting the Pilliga fossil gas is completely contrary to this declaration;
- The International Energy Agency (IEA), the United Nations (UN), and the Intergovernmental Panel on Climate Change (IPCC), have stated that there can be no new global investments in coal, oil, or gas projects if the world is to reach net-zero emissions by 2050;
- In 2022 the United Nations General Assembly declared that everyone on the planet has a right to a healthy environment; and
- In 2025, the International Court of Justice (ICJ) issued a major advisory finding that countries failing to act on climate change could be breaching international law, which has opened the possibility a UN Special Rapporteur may intervene in climate litigation cases involving the Pilliga gas fields and the pipelines associated with it.

It is eminently clear that any approval of a carbon producing resource projects takes Australia further away from our Paris commitments and will contribute to climate change.

End of Document