

North West Protection Advocacy
PO Box 197, Coonabarabran NSW 2357
Email: northwestPA@protonmail.com



An aerial image of the culturally sacred Bohena Creek which Santos intend to directionally drill underneath

Narrabri Lateral (NL) Pipeline

A 55km buried gas pipeline through the Pilliga Forest and the Namoi River valley, to convey coal seam gas (CSG) by SANTOS Narrabri Gas Project (NGP) to enable the development of the Narrabri Gas Field.

Application number SSI-53307723 EPBC ID 2024/10050

North West Protection Advocacy is a grassroots environmental advocacy group which is committed to preserving the cultural and ecological values of the Pilliga Forest. We pay our respects to the Elders of Gomeroi/Gamillaraay Country, past present & emerging.

Objection

We object to this application; it should be refused entirely and not approved with conditions. There are gaps in this EIS wide enough to drive a drill rig through. We lodge this objection but believe the EIS does not meet the requirements of the SEARs. This submission supports and endorses that of Wando CCC. We would like to convey our irritability at being requested to respond to this EIS, time and time again government have asked

community to comment on fossil fuel projects and again and again government has all but ignored community concerns for land, air and water, promoting “conditions” as able to ameliorate or stop damage and impact.

We make a note here that this submission/objection is incomplete. We are waiting for further information from the proponent in order to proceed.

Preamble

For the 2nd year in a row community has been asked to respond at the busiest time of year to over 1,000 pages of documentation for the Narrabri Lateral Environmental Impact Statement (EIS). This timing seems a deliberate tactic by Santos to decrease meaningful engagement and evade thorough scrutiny.

Frankly, after fifteen+ years of fighting to save the Pilliga Forest from both coal and coal seam gas extraction, people have had enough of these processes which all but ignore their concerns. Once again, Santos have stolen precious time from people’s lives and applied copious amounts of pressure in order to get what they want.

The NSW Government and the Federal Environment Minister have erroneously allowed this project to continue to impact the community socially. Time lost that can never be recovered.

In late September, early October of 2025, Santos began to apply the public pressure mechanism via media upon politicians and the NSW Government in front of this EIS exhibition. Memorandum of Understandings (MOUs) for gas deals were signed at flashy sporting events sponsored by the proponent.

The SA Premier¹ weighed in, spreading gas industry misinformation² and drawing Gomeroi fire, then NSW Premier Chris Minns threatened compulsory acquisition³ of the pipeline easement and finally the Prime Minister Anthony Albanese added his two cents worth. The push was on to get the NSW Department of Planning to have this Exhibition before end of year. A rush job.

The exhibition period began on 20/11/2025.

Then in early December Santos pressured Gomeroi⁴ into signing an Independent Land Use Agreement (ILUA). This meeting occurred directly after the Gomeroi Nation and Santos were scheduled at the National Native Title Tribunal (NNTT). One of three federal court judges who was to oversee an appeal on the determination was recused due to a conflict of interest⁵, the court case was delayed from November 2025 until March 2026. The Nation Meeting went ahead regardless of this NNTT delay on the 6-7th December, in effect circumventing the outcome of the determination.

Questions are being asking about the validity of the ILUA given notification and consultation issues have arisen. There is now some confusion as to whether the conditions set by the NNTT are still valid.

At the same time (early December) **Environmental Justice Australia** was in court on the Water Trigger⁶, this was dismissed meaning the Narrabri Lateral Pipeline (major gas infrastructure) would proceed without proper assessment of its impacts on water.

Secretary’s Environmental Assessment Requirements (SEARs)

As we began to write this objection, we became aware that the documents on exhibition appear to be lacking in critical detail and do not appear, in some instances, to fulfill the SEARs.

Notably, adequate baseline data, cumulative impact documentation, blasting geotechnical, directional drilling geotechnical and the absence of sufficiently specific, detailed and accurate information.

The lack of geotechnical information prevents the public and decision-makers from understanding or scrutinising key impacts and renders the water, Groundwater Dependent Ecosystems and hydrological assessment non-compliant.

We call on the Department of Planning to include specific reference to these matters in its Assessment Report, ensuring that the Recommendations of the 2017 Independent Review of Assessment Reports (Corbyn Report) are observed, particularly Recommendation 12: *Investigate approaches for better understanding, analysing and presenting information on risks and potential cumulative impacts, recognising the challenges faced when dealing with individual proposals.*

¹ <https://www.abc.net.au/news/2025-09-26/peter-malinauskas-under-fire-over-santos-gas-project-gomeroi/105817448>

² <https://australiainstitute.org.au/post/sa-premier-spreads-gas-industry-misinformation/>

³ <https://www.afr.com/politics/minns-threatens-compulsory-acquisition-to-get-narrabri-gas-moving-20251029-p5n67w>

⁴ <https://nit.com.au/05-12-2025/21654/meeting-set-to-determine-gomeroi-peoples-position-on-santos-gas-pipeline-plan>

⁵ <https://www.energynewsbulletin.net/operations/news-analysis/4523620/santos-narrabri-project-disarray-judge-recuses-appeal-hearing-bias>

⁶ <https://envirojustice.org.au/press-release/federal-court-ruling-narrabri-gas-pipeline/>

Management Plans

There is an over reliance by the proponent on only providing detail in “Management Plans (MPs)” and using MPs as an excuse to not provide sufficient detail in the EIS on high-risk operations, the result is community are kept in the dark and cannot thoroughly examine the potential impacts.

For example:

- *Aboriginal Cultural Heritage MP* – EIS avoids documenting the location of Aboriginal sites within and close to the disturbance footprint, and marking sites on plans that will not be impacted as 'no-go' areas (mitigation measure HE3)
- *Decommissioning and Environmental MP* – EIS avoids documenting management of residual gas to ensure compliance with relevant air quality criteria and suppression measures during earthworks and equipment operation.
- *Construction Traffic and Access MP* – EIS avoids documenting dust, emissions, safe access, driver code of conduct, bushfire awareness
- *Blasting MP* – EIS avoids documenting rock permeability, fracture networks, potential connectivity to perched aquifers, bedrock–soil interfaces at creek crossings and impact on faulting.
- *Biodiversity MP* – EIS avoids documenting describing measures to avoid, minimise and manage impacts on biodiversity values and the unexpected find protocol.
- *Construction Soil and Water MP* – EIS avoids documenting a wide range of topics
 - erosion hazard, saline or sodic soils, including the requirement to prepare site and activity-specific erosion and sediment control
 - managing topsoil and subsoil stockpiles
 - managing any unidentified contamination in accordance with an unexpected contaminated finds procedure managing any accidental spills or leaks of fuels and chemicals
 - managing the application of dust suppression water, including the quality and quantity of water used, and the rate of application arrangements for managing wet weather, including monitoring potential high-risk events (such as storms) and specific controls to be applied to dispersive soils and follow-up measures.
 - how potential impacts on instream habitat and fish passage will be managed and there is no examination of how decommissioning could impact soil and water
- *Construction Noise and Vibration MP* – EIS avoids documenting measures to minimise impact, blasting impact modelling and no geotechnical parameters
- Bushfire Management Plan – EIS avoids documenting risk from storage of combustible fuels or ignition from works areas, potential risk of ignition and the risk of fires spreading
- HAZOP study
- Further pipeline safety studies
- Rehabilitation MP – EIS avoids documenting the existing linear pipeline infrastructure from Bibblewindi WTP to Leewood.

NSW DCCEEW Gas Supply and Pipeline

The NSW DCCEEW Gas Supply and Pipeline regulatory and process changes Information Session will be held on the 17th December, one day before this exhibition closes. We can't comprehend why the NSW Government thinks it is acceptable to deliver this dog vomit of rules, regulations, changes, submission periods and pressure mechanisms at the worst possible time of year unless to deliberately attempt to limit engagement.

Risks to groundwater and surface water

- This pipeline itself poses unacceptable risks to the Great Artesian Basin Recharge Zone and surface and groundwater both during construction and ongoing operation. These risks are understated, or not stated at all

in the EIS. Accidents (loss of containment) are common and Santos have had several that have been made public with many more likely that are not public.

- Six water courses are to be horizontally drilled under with no detail provided
- Construction of this pipeline will significantly impact overland flow particularly over the 12 farms
- Leaks from pipeline, defects or deterioration are material risks. Naturally Occurring Radioactive Materials released during potential loss of containment incidences are high risk.
- This proposed pipeline traverses the critical recharge zone of the Great Artesian Basin (GAB) and is to be trenched under the ironstone ridges (ironstone is defined as a sedimentary rock that contains more than 15% iron) of the Pilliga Forest. These ridges protect the critical recharge zone of the GAB. Blasting may be needed to construct these sections and there is scant detail of this process in the EIS. This is the type of detail which absolutely should be included. Where the blasting will occur is left out of the EIS and this is a serious gap.

Risks to Biodiversity

- Habitat connectivity will be seriously impacted by 30-50m wide clearing needed for construction
- Construction will create an impassable kill zone for any small native fauna
- Construction will create a super-highway for predatory ferals like dogs and foxes
- Construction will create weed infestation problems which will seriously impact regeneration potential
- Construction will create a catastrophic dust impact especially on smaller plants and groundcovers

Santos claims the main impacts on Biodiversity would be during construction of the pipeline (Chapter 6, page 3). When we examine this project holistically i.e. in conjunction with the NGP we see that this is incorrect. There will be increasing impacts experienced as Phase 2 & 3 of the NGP will follow.

Has the Department compared the biodiversity listings of flora and fauna from this EIS to that of the NGP, NU and the scoping report completed by GHD for the EPBC referral?

Critical Flora known to occur in the project area

(all of these are rare apart from Soft Aotus and Round Leaf Goodenia)

Creeping Malvaceae

Soft Aotus (appears to be missing from the EIS, not listed as rare but is critical)

Coolabah Bertya

Conic Umbrella Sedge

Bluegrass (appears to be missing from the EIS, rare)

Finger Panic Grass

Painted Diuris; Pine Donkey Orchid

Round Leaf Goodenia

Spiny Peppergrass

Winged Peppergrass

Large Leaved Monotaxis

Native Milkwort

Scant Pomaderris

Cobar Rustyhood; Cobar Greenhood Orchid

Slender Darling Pea

Austral Toad Flax

Slender Tylophora

Santos assessment details other species:

Androcalva procumbens (syn. Commersonia procumbens)

Tylophora linearis (Tylophora linearis)

Species assumed present

Belson's Panic (Homopholis belsonii)

Large-leaved Monotaxis (Monotaxis macrophylla)

Scant Pomaderris (*Pomaderris queenslandica*)
Slender Darling Pea (*Swainsona murrayana*)
Austral Toadflax (*Thesium australe*)
These lists are not complete.

What these lists illustrate is the species variety of threatened and critical plants in the project area. The Pilliga is a biodiversity hot spot of incredible value, there are no offsets available that can replace this habitat like for like.

Records show the Ocellated Velvet Gecko⁷ occurs precisely where Santos want to construct the Narrabri Lateral gas pipeline but this gecko is not mentioned.

<https://bie.ala.org.au/species/https://biodiversity.org.au/afd/taxa/05c1b202-9088-4dd3-ab8c-19219fad8780>

Risks to Threatened Species Habitat

- Construction will clear 168 hectares of forest and will cut a 30-50m metre wide swathe through the Pilliga East Forest, creating areas where microbats and small mammals can be preyed upon.
- It will put at risk threatened species that have strongholds in the Pilliga, like the Pilliga Mouse, Eastern Pygmy Possum, and Corben's Long-eared Bat.

The habitat of several threatened species is being cleared at the same time this project is under exhibition. For example, the eastern entry to the Pilliga is undergoing an upgrade (Caloola Rd) which involves widening, realignment and resurfacing. Large habitat trees of nationally protected species, Swift Parrot, Glossy Black Cockatoo, and Koala (among others) have already been cleared in unknown numbers by Whitehaven Coal which operates the Narrabri Underground coal mine in close proximity to the proposed pipeline route.

The area of Smithers Gate (which connects Caloola Rd with the forest) and less than 1km away from the above Whitehaven clearing was the subject of a bird survey for this EIS. **We assert that this survey needs to be revisited.**

Cumulative Impact (CI)

- CI Chapter is seriously flawed and should be revisited
- Narrabri Underground Stage 3 is missing from assessment on unfounded claim that information is lacking
- Irreversible harm to biodiversity from CI
- Irreversible harm to groundwater from CI
- An increase in traffic on existing traffic levels as a result of the project together with other relevant future and omitted projects is a CI which is drastically understated in the EIS
- CI from dust, noise and vibration of the NGP and NL should be detailed in their own technical studies and further detail provided

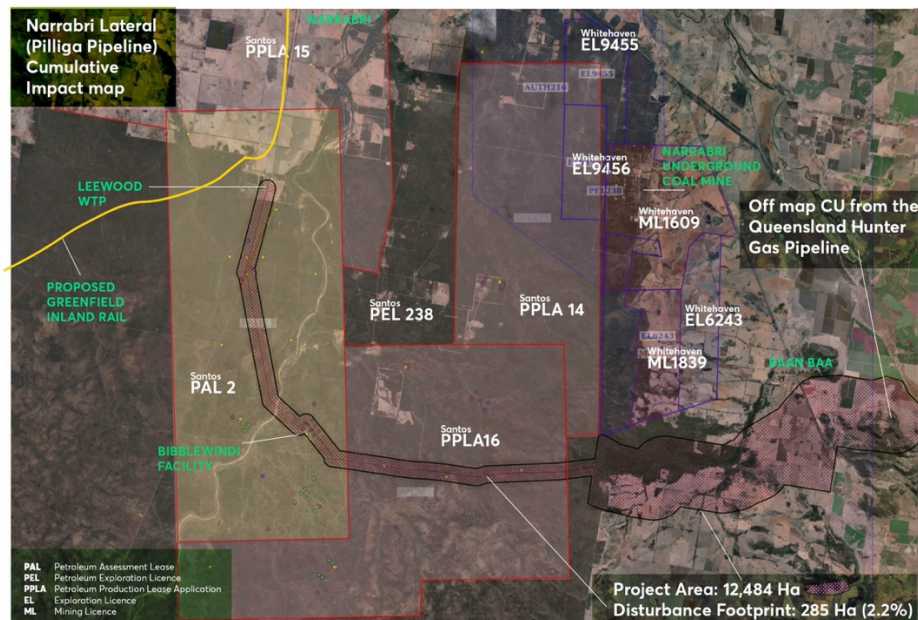
In 2023 the NSW Department of Planning and Environment rejected a bid by Santos to avoid cumulative impact assessment of its planned Narrabri Lateral Pipeline. In its Secretary's Environmental Assessment Requirements⁸ ("SEARs") issued on 9th February 2023, the Department called on Santos to consider "the potential cumulative impacts due to other developments in the vicinity (completed, underway or proposed)". This was despite Santos claiming in its Scoping Report for the gas pipeline that there would be no cumulative impacts in relation to atmospheric emissions (deliberate or accidental), biodiversity and bushfire risk, with other industrial projects in the Pilliga Forest.

Narrabri Underground Mine Stage 3 is missing from the EIS. We believe the impact from this project which has a hard border with the NGP and also mines the same coal seam should be considered as a principal CI.

The reason given is: "*Narrabri Underground Mine Stage 3 Extension Project - MOD 2 Bord and Pillar Mining Extension (SSD-10269) - the project is at the modification report preparation stage, and there is insufficient publicly available information to support a CI analysis.*" Chapter 19.

⁷ <https://bie.ala.org.au/species/https://biodiversity.org.au/afd/taxa/05c1b202-9088-4dd3-ab8c-19219fad8780>

⁸ <https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=SSI-53307723%2120230208T233101.479%20GMT>



A key component of strategic assessment and project-level EIA is the consideration of CI's. The NSW CI Assessment Guidelines for State Significant Projects requires that a combination of quantitative assessment (where there is sufficient information available) and qualitative assessment (where there is insufficient information available) are completed in relation to relevant projects. Santos has chosen to exclude the Narrabri Stage 3 Underground Mine project (State Significant Development SSD10269) for consideration as a CI on grounds of project status – the company states that although the Underground stage 3 mine has been approved but not commenced (and therefore should be considered), “there is insufficient publicly available information to support a CI analysis”.

CI's/effects may result from a number of activities interacting with the environment. The nature and scale of these effects can vary significantly, depending on factors such as the type of activity performed, the proximity of activities to each other and the characteristics of the surrounding natural, social and economic environments (Brereton and Moran, 2008). They may also be caused by the synergistic and antagonistic effects of different individual activities, as well as the temporal or spatial characteristics of the activities. Importantly, cumulative effects are not necessarily just additive. The proposed CSG activities in a region are growing thus increasing the potential for an impact on the underlying aquifers. The implication of multiple mining activities in one region is that impacts may overlap and result in larger impacts than would be expected for a single mining operation (cumulative effects).

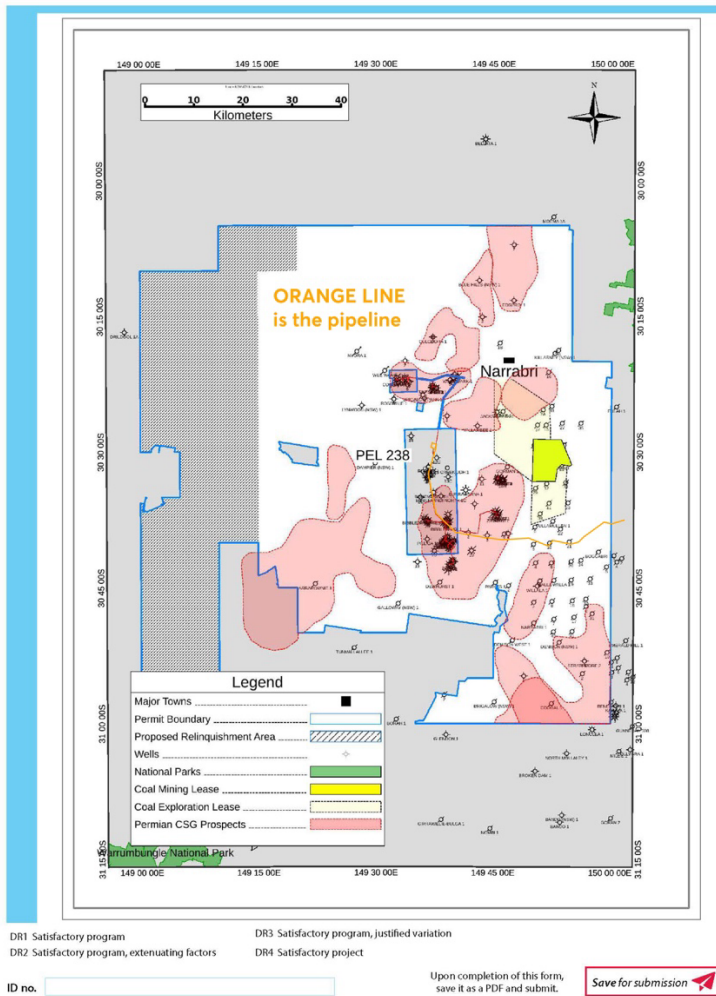
It is likely that the CI's of this project and other relevant and omitted future projects will result in significant impacts on several threatened species including Swift Parrots and Glossy Black Cockatoos (both of which have been recorded in this area of the Pilliga in recent times), Pilliga Mouse, Eastern Pygmy Possum, and Corben's Long-eared Bat. This must trigger the precautionary principle and assure that this CI assessment will be revisited to become more comprehensive.

It is likely that the CI's of this project and other relevant and omitted future projects will result in significant impacts on groundwater, surface water and GDEs. This must trigger the precautionary principle and assure that this CI assessment will be revisited to become more comprehensive.

The image on the next page is 'Document 34' – it is taken from Santos' works program. The pipeline has been drawn in by NWP, it is orange. The small circles represent per-existing wells and proposed wells. You can clearly see the overlap with the Whitehaven areas both above and below the yellow coloured “Coal Mining Lease”.

Santos have avoided inclusion of the Narrabri Underground Stage 3 as a cumulative impact even though they intend to sink gas wells in that project footprint. See Document 34 below acquired by GIPA from Regional NSW.

Map of proposed exploration activities
(submitted with any application for a new title or renewal)



Document 34 – Santos Works Program Mapping

Construction risks and gaps

- Santos estimates the disturbance footprint to be 212ha including clearing for roads, access tracks and pipeline trenching. This is based on a 30m wide easement.
- The EIS has very conservatively estimated the disturbance footprint.
- The pipeline crosses 12 farms, and a little under half the land it will disturb is agricultural land, one fifth of the land to be disturbed is cropping land.
- EIS does not detail high point vents and low point drains

The NL route is not known with certainty, but judging from maps contained in the EIS, road widening, new access tracks, road straightening and accompanying tree clearing will result in significant exceedances of portrayed disturbance footprint.

We can predict this because the size of vehicles needed to transport pipeline constructional materials and heavy plant is already known. It is important for decision makers to have a grasp of the scale of Oversize Overmass (OSOM) vehicles, which are typically defined as being wider than 2.5 meters, longer than 19 meters, or taller than 4.6 meters. The new access “tracks” will in fact be double laned “highways” to accommodate the 5.3m wide heavy plant equipment detailed in the Technical Transport appendix.



A typical pipeline trencher

Gomeri Cultural Heritage Impacts

- The Pilliga as a whole has deep spiritual, social and cultural significance for Gomeri people. The National Native Title Tribunal acknowledged that all water resources, and Bohena Ck in particular, is of major cultural importance to Gomeri people. The Tribunal said there should be no ground or surface disturbance within 500m of Bohena Ck without Gomeri consent.
- However, Santos plans to drill the pipeline under Bohena Ck and across six other major creeks, disturbing the alluvial groundwater. The EIS does not discuss the cultural significance of the entire Bohena Ck for Gomeri people at all.
- Construction of the pipeline will also wipe out two known sites of significance and damage a further four sites. Gomeri people have said the Pilliga's integrity is central to their wellbeing and cultural practice and must be kept whole.

As confirmed by the National Native Title tribunal, it is beyond dispute that all water resources in traditional Aboriginal land are of significant cultural importance to Traditional Owners. This includes Bohena Creek and other ephemeral creeks within The Pilliga, including Mount Pleasant Creek where a Significant Aboriginal Site was discovered by archaeologists during scouting for the pipeline route.

Despite this, the EIS does not discuss the significance of Bohena Creek at all, and Santos plans to flout the Tribunal's position on the cultural heritage of water resources.

Bohena Creek



Bohena Creek crossing on X Line Rd

- Directional drilling risks
- Faulting under Bohena Creek

Santos proposes to directionally drill under Bohena Creek and six other major creeks, which could permanently alter the sensitive and ever-changing landscape, resulting in soil erosion and irreparable disturbance to the fragile creek systems.

Directional drilling has multiple risks and a preliminary examination of this topic within the EIS reveals basic information but nothing of any substance, there are no engineering or technical drawings detailing specifications and we believe that there are gaps due to incomplete geotechnical studies.

Bohena Creek is 70-75m wide at the location of the under drilling. With the 500m buffer zone of no disturbance this mean that the excavation will be at least 1km in length. It is unclear how this engineering will be achieved.

Bohena Creek is known to have faulting as identified in this report⁹ and this is not mentioned in the EIS.

Yellow Spring Creek and Yellow Spring Dam

- Yellow Spring Dam could be an unrecognised GDE/MNES
- Mapping in the EIS indicate a well pad on the corner of Beehive Rd and the dam access track, the area around this dam should be given a buffer zone similar to Bohena Creek in the National Native Title Tribunal conditions.

⁹ <https://gisera.csiro.au/research/surface-and-groundwater/assessment-of-faults-as-potential-connectivity-pathways/>



Yellow Spring Dam shortly after the Duck Creek Fire. Image courtesy of Wando CCC

The EIS does not recognise the ecological value of this permanent water source known to sustain a wide range of bird species and terrestrial animals including the koala. As the name suggests, Yellow Spring Dam is in the path of drainage of Yellow Spring Creek and evidently the site of a natural spring. The presence of GDE such as stygofauna must be considered by this EIS, which does not mention Yellow Spring Dam as a potential GDE site, and therefore a Matter of National Environmental Significance.

This is contradicted by Figure 4.21 of Technical Report 4 which indicates that the length of Yellow Spring Creek from Beehive Rd to the Dam is a “High Potential GDE” location.

The Narrabri Lateral Pipeline EIS mischaracterises ephemeral creeks like Yellow Spring Creek because it repeatedly equates ephemeral surface flow with low ecological significance, in contrast with robust scientific evidence to the contrary. The result is an underestimation of environmental risk, inadequate assessment effort, and a failure to apply the precautionary principle. Therefore, the EIS must be returned to Santos to undertake suitably robust assessment where gaps exist in the assessment of Matters of National Environmental Significance under the EPBC Act, and all other potentially severe or irreversible impacts on the baseline biodiversity assessments.

Blasting the Ironstone Ridges

- Ironstone ridges should be considered areas of heightened conservation value during environmental impact assessment processes because:
- They support specialist and refuge-dependent species.
- They have limited capacity for ecological recovery if disturbed.
- Construction activities (e.g., pipelines, trenching, access track widening) in these areas often require blasting or mechanical rock cutting, resulting in disproportionate surface and subsurface disturbance.
- Their hydrological and geomorphic functions influence downstream ephemeral creek systems.

Decommissioning and Final Rehabilitation

Decommissioning the pipeline is addressed in the EIS at 3.8.1: *“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."

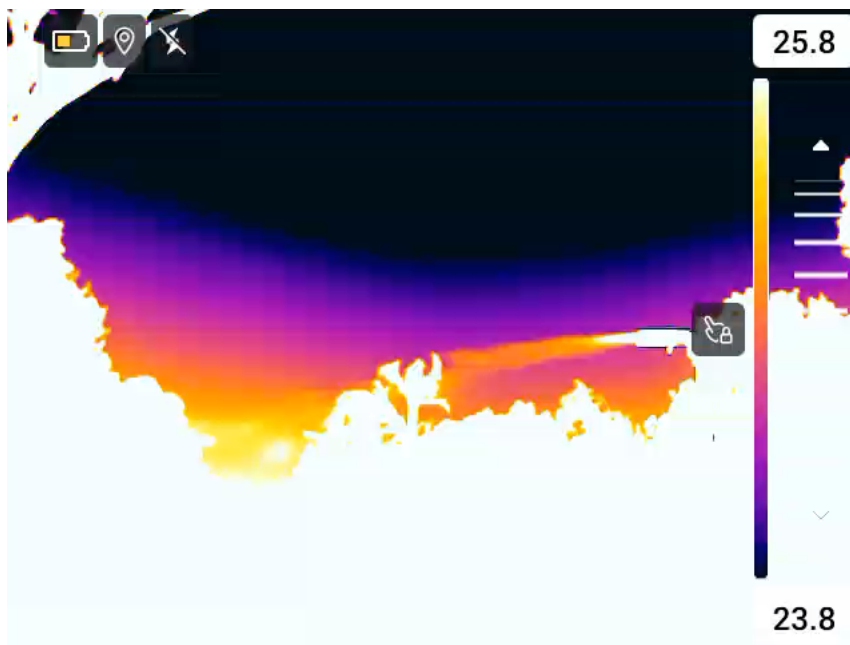
There is no mention of corrosive decline, bacteria, faulting or NORMs (Naturally Occurring Radioactive Material). Remember this pipeline crosses the recharge zone of the Great Artesian Basin. Santos fail to mention that there is already existing linear pipeline infrastructure between Bibblewindi WTP and Leewood WTP

Faulting

There is no mention in the EIS of the known faulting in the Pilliga Forest area. CSIRO/GiSERA have been studying this for years and have come to the conclusion that more work is needed at a deeper level to provide

Venting along the pipeline

There is no mention in the EIS of high point vents and low point drains. Why are these pieces of infrastructure not detailed, particularly in the Chapter 10 - Air quality and Chapter 18 - Greenhouse gas. Pipeline vents release large amounts of toxic gasses



This is a high point vent leaking gas



A drain in the Pilliga

Other issues

- Santos' Environmental Impact Statement (EIS) for the pipeline claims the economic "benefits" of the Narrabri gasfield and Hunter gas pipeline, but doesn't take responsibility for the harm to biodiversity, water and climate from the bigger pipeline and gasfield.
- The EIS should be amended to consider the full negative economic impacts of the greenhouse gas emissions from the gasfield and the two pipelines, which is likely to be very significant given Narrabri is predicted to be the sixth biggest source of greenhouse pollution in NSW.
- Water requirements are excessive given that Narrabri township is currently experiencing water stress
- Biocides and corrosion inhibiting chemicals may be added to hydrotest water
- Water to be used for hydrotesting from Leewood RO if available – this would imply that the RO facility is to become operational again? NSW Planning should not consider permitting Santos to use reverse osmosis treated water as this water already has a chemical signature.

In conclusion we feel that this EIS has been rushed through at the end of the year, the busiest time of the year for many people. It should be rejected by NSW Planning as it will change the Pilliga irreversibly from an inland Great Barrier Reef to an industrialised wasteland.

Image Gallery



A Santos pipeline easement in Hallett State Forest in Queensland



A gathering line is exposed to be repaired, Hallett State Forest, QLD



This fire is the result of a dozer hitting the gas line near Injune in QLD in 2024



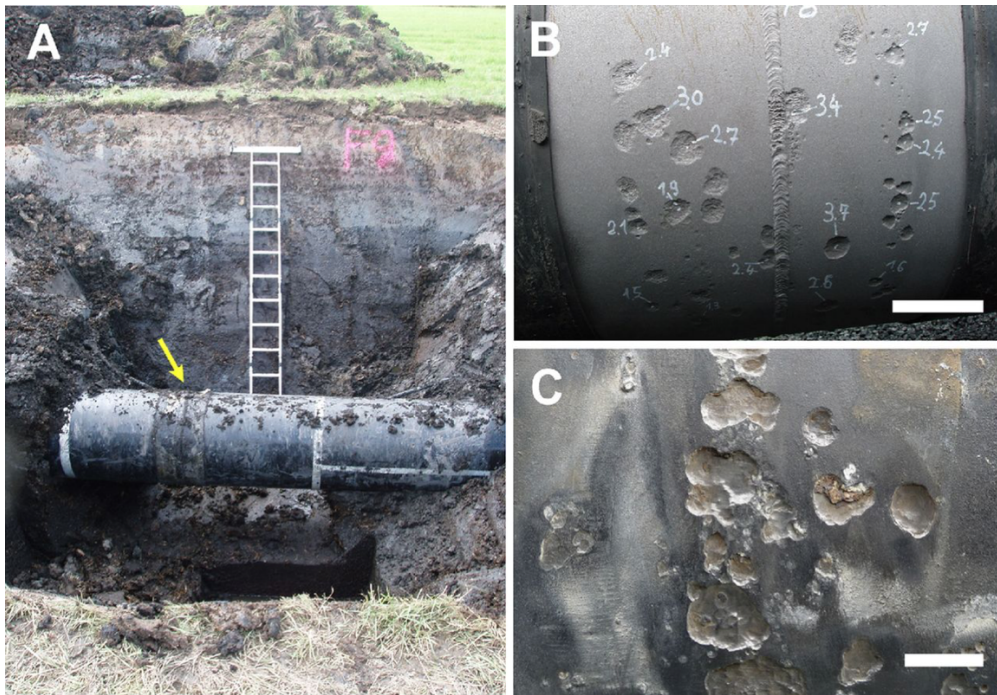
A laydown yard in south-west Qld



Pipeline construction in south-west Qld







Corrosion and pitting on an underground gas pipeline