



Liverpool Plains Action Group Inc.

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Introduction

The **Liverpool Plains Action Group Inc. (LPAG)** is an incorporated community group representing members from Willow Tree to Boggabri who are committed to protecting the water and agricultural resources of the area.

This submission is an objection to the Narrabri Lateral Pipeline.

History

The local and broader community has been rejecting inappropriate coal and gas developments for nearly 15 years, with our group originally formed as **Caroona Coal Action Group**, which successfully opposed both the proposed BHP Caroona and Shenhua Watermark Breeza coal mines that were highly contested in their development due to impacts on ground water. These projects both ultimately had their exploration licences withdrawn and compensated by the NSW Government of the day.

The inextricable linkage between the Narrabri Gas Project and the Liverpool Plains

We attach with this submission the **2021 NSW Future of Gas Statement** that remains current policy. PELs 1 & 12 cover most of the Liverpool Plains and were retained to “*support the development of the Narrabri Gas Project*” as noted in the FOG statement. Therefore, it is entirely appropriate to consider the development of the Narrabri Gas Project and the Narrabri Lateral Pipeline in the wider context of the remaining PELs that exist to support the Project and will ultimately be an extension to the NGP once pipeline infrastructure is installed.

We argue that the economic costs of coal seam gas developments across northwest NSW are greater than the benefits **in the long term** due to the irreparable damage that coal seam gas (CSG) production will have on water, environmental and agricultural resources, particularly across the Liverpool Plains which hosts some of Australia’s most fertile and productive farming land. We support the protection of this significant food bowl.

Long term, negative impacts and costs to groundwater resources

We attach information prepared by Emeritus Professor Ian Acworth explaining the case against CSG on the Liverpool Plains. He is a leading hydrogeologist who has been studying the Liverpool Plains for many decades and whose work contributed to the no-go decisions made regarding the proposed coal mines on the Liverpool Plains. This is publicly accepted and unrefuted information, so please do take the time to understand the issues at hand.



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Be sure you note his predictions regarding ground water:

“Abstraction of groundwater from the coal seams to enable recovery of gas will immediately impact the whole groundwater resource – dropping levels even more dramatically than they already are. Irrigation supplies will not be sustained for very long and shallow farm domestic supplies will rapidly dry out.”

He also predicts widespread subsidence – *“it can be expected that the impacts of pressure reduction will be felt over large areas”* – and *“the probable creation of mud mounds regionally. These could cover roads, fences and in extreme cases, even buildings”*.

These are devastating, long term, irreparable impacts that will occur across PELs 1 and 12, and will materially impact rural water supplies and agricultural production. The widespread impacts are the result of high interconnectivity between aquifers, and this also means that impacts will be incurred well beyond the boundaries of any properties that might choose to host the activities. These long-term costs must be acknowledged and incorporated into the planning process at this early stage to avoid costly compensation – as occurred with the proposed BHP and Shenhua coal projects.

Objection to the Narrabri Lateral Pipeline – Inadequate Information

In response to the Narrabri Lateral EIS on exhibition for comment we commend and support the work of other community groups who will show significant gaps in information provided in the EIS by the proponent.

Objection to the Narrabri Lateral Pipeline - Soils

We highlight yet again to the Department of Planning via this submission and to Santos the analysis of local Liverpool Plains based Soil Scientist Dr Rob Banks who studied the existing soil types typically found on the Liverpool Plains after the existing Central Ranges Pipeline became “washed out/exposed” on the property “Barana” near Coolah on the Black Stump Way. During a rainfall event vast areas of topsoil were disturbed and eroded, exposing the gas pipeline in a wheat/cropping paddock. To repair this erosion, 2800 metric tonnes of rock and cement was used to repair the exposure location and top dressed with soil. The Central Ranges pipeline continues to be exposed with multiple sites requiring repair and rectification, often on private landholder land. These farming businesses are often impacted not just by the exposure, but by the time required for repair and rehabilitation and a loss of productive top soil and vegetation.



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These vertosol soil types are highlighted in Dr Banks report as wholly inappropriate for high-pressure gas pipelines with additional risk borne not exclusively by Santos, but predominantly by private landowners.

The report states clearly there is a “*significant risk of failure*” of a gas pipeline buried in the soil types found on the Liverpool Plains.

In contest and to scrutinise the findings of Dr Banks work the prior proponent/owner of the Hunter Gas pipeline (that connects to the Narrabri Lateral) sought review of the Soil Future report and in turn the **SEEC Review attached** here to this submission was delivered back to community members. The report’s findings generally agreed with the 2011 Soil Futures report and agrees with the conclusions and findings that there is *significant risk*.

The Narrabri Lateral proposed pipeline should be avoiding these critical and “riskier” soil types locations as highlighted in these reports (attached).

Certainly, many landholders and farmers across the Liverpool Plains reject the imposition of the Hunter Gas Pipeline that is proposed to cross highly prized and productive irrigation and cropping land that shouldn’t be impaired or imposed by developments that are wholly inappropriate to the soil types.

Objection to the Narrabri Lateral Pipeline – Project Need

The project is not assured to address the problems of the East Coast gas market.

IEEFA recently reported “development of Narrabri may lead to more costly domestic gas supply while cheaper gas from Queensland is exported and topped up with gas bought from other domestic suppliers, to the detriment of domestic gas users and households”.

We note with interest the significant investment, construction completion and network connection of the Squadron Energy *Port Kembla Gas Import Terminal* and most recently this month the appointment of international company *Reganosa* to operate and maintain the onshore facilities of the Port Kembla Energy Terminal.

This site alone has the capacity to bring in twice as much Gas a Narrabri claims to be able to deliver, with an investment decision already made to construct and operate the terminal. Further it will be able to deliver gas into the NSW network much sooner than the NGP and be much more responsive to demand – without the devastating impacts that will accompany the NGP, associated pipelines and the development of further gasfields.



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Comments regarding the exhibition process

It is typical of the proponent to again release an EIS via the Planning Department for comment during the busiest time on farm for those community members most deeply impacted by proposed developments.

Reviewing thousands of pages of an EIS across multiple individuals and community groups who have concern and interest in these developments, with just 28 days to respond is irresponsible and rushed.

Conclusion

Whilst the Future of Gas Statement remains current policy in NSW, our communities will continue to fight and defend the Liverpool Plains and consequently oppose the Narrabri Lateral Pipeline.

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