



18/12/2025

**Narrabri Lateral EIS - People for the Plains Submission objecting to its approval**

People for the Plains has been representing residents of Narrabri Shire who have concerns about the Narrabri Gas Project for over 11 years, being actively involved in the government approvals processes and the project Community Consultative Committee over that time.

**Demand Referral to IPC**

P4P demands that this project is referred to the IPC for a more thorough investigation of the impacts. This project is not in the public interest and its negative impacts outweigh the positive impacts when alternative solutions are currently available with less cost and less negative impacts.

The social wellbeing of the community is one of the overriding purposes of the Planning legislation. The EIS prepared by Santos is deficient and does not address the social impacts of the project for all the reasons that we will set out below. For those reasons, the Minister should not approve the pipeline without referral to the IPC for review.

**Social Impacts**

Following the approval of the Santos Narrabri Gas Project (NGP) in September 2020, the Narrabri Gas Project Community Consultative Committee (NGPCCC) was established under Section A21 Conditions of Consent, with committee members appointed by the NSW Department of Planning Industry and Environment (Department of Planning).

For most of the time since Santos acquired the NGP in 2011, People for the Plains (P4P) have provided a delegate to the NGPCCC. We have gained a comprehensive understanding of the processes surrounding coal and coal seam gas (CSG) to educate and advocate on issues of concern to the North West New South Wales communities.

The purpose of the NGPCCC is for Santos to provide a forum for open discussion, promote information sharing, and respond to matters of concern raised by the community.

It is the view of P4P that the NGPCCC falls short of achieving this purpose. This is because issues and concerns raised by P4P at NGPCCC meetings that are of importance to our community are routinely minimised, excluded or disregarded.

Details and evidence of these situations from the last five years are documented extensively in a report recently provided to Secretary of the Department of Planning which can be accessed here

<https://drive.google.com/drive/folders/1tGwFNwPdflmJzUv5AjMN33jkAAXRoTciF?usp=sharing>

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This situation demonstrates:

- That Santos has no social licence and is not a suitable operator to be considered for further approvals for more projects
- That the SIA for the lateral is not comprehensive as it does not provide any indication of these issues
- That simply including a Condition of Consent for operating a CCC is not enough to ensure effective outcomes

- That the non-binding nature of the Terms of Reference for the operation of the CCC's is not enough to ensure effective operation of the CCC
- That Santos is not interacting with the community in a way that makes their project acceptable

Please review the evidence provided in the folder which on its own is enough to demonstrate that approval should not be given to the Narrabri Lateral Pipeline.

### **Climate Risk Assessment**

The northwest NSW region is highly susceptible to climate change impacts.

Evaluating the greenhouse gas impacts of a project involves more than calculating the volume of emissions it will produce. A credible assessment must examine how those emissions contribute to climate change and the resulting effects on environmental systems, community wellbeing and economic activity at both the local level and across NSW.

The EIS for the Lateral pipeline does not undertake this broader analysis. It asserts that the project's climate impacts on the Narrabri area will be insignificant, yet this conclusion is founded on an emissions assessment that omits both upstream and downstream sources associated with gas extraction, transport and use. As a result, the claimed lack of local climate impact is not supported by a complete or realistic assessment of the project's contribution to global warming.

Recent national analysis demonstrates why this approach is inadequate. Work undertaken for the [National Climate Risk Assessment](#) showed how climate change is expected to affect regional and rural communities, including the vulnerability of supply chains and critical infrastructure. Disruption to key transport and energy corridors has already been shown to cause substantial losses for primary producers and can compromise the delivery of essential goods such as fuel, food and medical supplies to rural areas.

Primary industries were identified as one of the most exposed sectors in the National Climate Risk Assessment. The Assessment concluded that by 2050, climate related risks to the primary industries and food system are projected to rise to high or very high levels, with medium confidence. These risks threaten the long term viability of agricultural systems in many regions and are compounded by impacts on natural systems, including ecosystem degradation and the loss of services on which agriculture depends.

The Assessment also found that pressures on primary production do not occur in isolation. Impacts are expected to flow through to other systems, including the broader economy, trade and financial stability, as well as health and social support services. These cascading effects include heightened risks to food security, increased stress on rural health services and negative mental health outcomes for producers and rural communities.

In addition, the National Climate Risk Assessment documented significant risks to terrestrial ecosystems, including temperate forests and river systems. Rising temperatures and shifting rainfall patterns are expected to drive substantial ecological change. In the Narrabri region, the Pilliga Forest, the Kaputar ranges and the Namoi River and groundwater systems are all highly vulnerable to these climate driven pressures.

Given this context, it is essential that the Department obtain robust, place based advice on how climate change is likely to affect the Narrabri region and NSW more broadly. That advice should clearly explain how greenhouse gas emissions from the Narrabri Gas Project and the Narrabri Lateral Pipeline contribute to the climate risks already identified, and how those risks intersect with the environmental, social and economic values of the local area.

Unique elements of our region are particularly susceptible to the impacts of climate change. Of particular note in the Narrabri Shire is our infamous Kaputar Pink Slug that we are very proud of. It can only be found here on Mount Kaputar when conditions are suitable. It requires damp and cool conditions so it is very susceptible to warming temperatures and increased droughts. It has been estimated that 90% of the species perished in the 2019 bushfires on the Mountain.



Image: Australian Museum Research

The 2019 drought was crippling for our community. Many farming families had no income for several years, many making major life changes to cope and significant negative health impacts occurred.

The drought was broken by multiple floods. Undoubtedly we are facing increased weather extremes that make life and business difficult to manage. Below are a number of sources describing how this economic and social impacts from climate change will worsen in coming years if our GHG emissions current trajectory continues.

The [NSW and Australian Regional Climate Modelling project](#) – produces detailed regional climate change projections. In a High Emissions scenario (that many predict we are in) show that Narrabri will be facing:

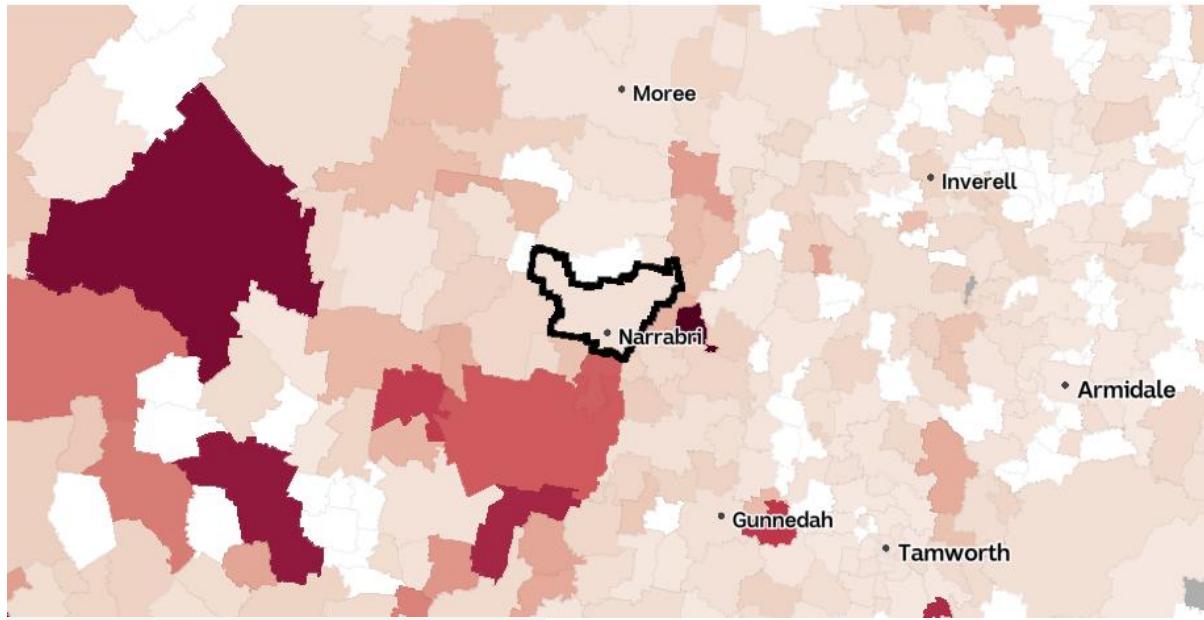
- an extra 8.4 hot days (over 35 degrees) by 2039
- 12.7 days less of cold nights (under 2 degrees)
- And a decrease in rainfall of -2.62% per annum.

Cotton is the predominant crop in this region that provides significant economic benefits to the region. [Cotton industry research](#) has found that warmer temperatures accelerate the rate of crop development, shortening the time to maturity, and can cause significant fruit loss, reduced water use efficiencies, lower yields and alter fibre quality. More frequent extreme weather events such as droughts, heatwaves and flooding pose significant risks to improvements in cotton productivity.

The [Climate Council's assessment](#) of the top 20 electorates in Australia most at risk of climate change puts Parkes electorate in 13th place classing 9.3% of properties at high risk of either being already, or will be classed as uninsurable within ten years.

Analysis from [Climate Valuation](#), looks at a range of factors to calculate risk categories down to an LGA level. It uses a measure that captures the costs of expected extreme weather and climate-related damage relative to the replacement cost of the average home. In a high emissions scenario it shows that by 2050 4.03% of Narrabri township homes will be totally unaffordable or impossible to insure. It also exposes other more vulnerable locations across our region including:

- 12.39% of homes in Baan Baa will be unaffordable/uninsurable
- 93.75% of homes on Mount Kaputar will be unaffordable/uninsurable
- 21.84% of homes at Bullawa Creek will be unaffordable/uninsurable
- 50% of Pilliga Forest and 47.89% of Jacks Creek (close to where the Lateral will run)
- 82.45% of Walgett, 96.46% of Bourke



### Cumulative Impacts

The projects listed that were considered as part of the cumulative impacts assessment are ([section 3-3](#)):

- Narrabri Gas Project
- Queensland Hunter Gas Pipeline
- Narrabri South Solar Farm
- Silverleaf Solar Farm
- Inland Rail

However this list completely ignores the coal mining operations in the area, some of which are closer than some projects on this list. It should include:

- Narrabri Underground coal mine
- Boggabri Coal mine
- Tarrawonga Coal Mine
- Maules Creek Coal Mine
- Vickery Coal Mine

The cumulative impacts assessment is lacking and minimises the significant biodiversity, water and social impacts that the pipeline creates when considered alongside all of the major projects currently approved and seeking approval in this area.

In particular the works undertaken by Whitehaven on their biodiversity offset country at “Caloola North” and “The Bulga” must be considered as part of the cumulative impacts. These



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places have seen significant development recently including extensive clearing for fence lines, fire breaks and roads in close proximity to the Narrabri Lateral route.

### **Water Impacts**

People for the Plains have consistently raised our concerns about the predicted and recognised impacts to the GAB and to the GOB and to the recharge of the GAB, of which many of our members completely rely on for their water sources.

[Water Chapter 8](#) briefly references that horizontal directional drilling (HDD) may intersect groundwater (pg14) however it does not expect any contamination or impact to groundwater.

The EIS is quick to dismiss the chances of any contamination issues during the operational phase. Despite only having appraisal wells, currently they have still had over 20 spills and leaks in the existing gas field. The largest of these spills at the Bibbilwindi water treatment plant late in 2011, Santos covered up by blaming the previous owner of the project Eastern Star Gas when the evidence proves Santos were in fact the owners of the project. With this record it is a completely unrealistic assumption that there will not be any water impacts.

Once horizontal directional drilling starts it must continuously run till completed. What happens if a flood occurs whilst it is part way underneath one of these creeks? These contingencies are not considered in the EIS.

The Lateral pipeline construction and operation raises unique concerns about water contamination risks. In particular we are highly concerned about the 6 watercourse crossings that will use Horizontal Directional Drilling (HDD) which provides less surface disturbance by introducing more environmental problems with the drilling fluids used plus a large entry and exit area is cleared.

The process for the further 33 other watercourse crossings where edges will be cleared and graded at a minimum of 20m wide. Plus the additional clearing of areas beside water courses to assist with work and storing equipment. In particular, trenching of Yellow Spring Creek will impact this natural spring system that provides water to the Yellow Spring dam which is an important water source for wildlife.

There are numerous examples in the world where horizontal directional drilling has caused aquifer or water contamination both in Australia and overseas. This is by no means a safe option that requires no risk assessments and mitigation measures. The New Jersey Department of Environmental Protection has done a [detailed research report](#) showing the risk of the large volumes of drilling slurry (primarily bentonite and water) that can seep through fractures and conduits in rocks called inadvertent returns (IRs). It found that drilling mud, classified as a contaminant by the Clean Water Act when released, has the potential to negatively impact freshwater ecosystems by increasing water turbidity, altering overall water chemistry, and introducing harmful chemicals to plants and animals that could cause injury.

The potential for contamination to the Great Artesian Basin, the Gunnedah Oxley Basin and overlying aquifers in the area needs to be addressed and mitigated. The ways drilling fluids are handled and ways to minimise the amount of drilling fluids is not included.

### **GAB Recharge**

People for the Plains have long advocated for greater attention on the absolutely crucial role that the Pilliga Forest plays in recharging the water supplies of the Great Artesian Basin; undoubtedly Australia's most important water source. The CSIRO[i] has documented the recharge areas of GAB in the following map, using the black hatching.

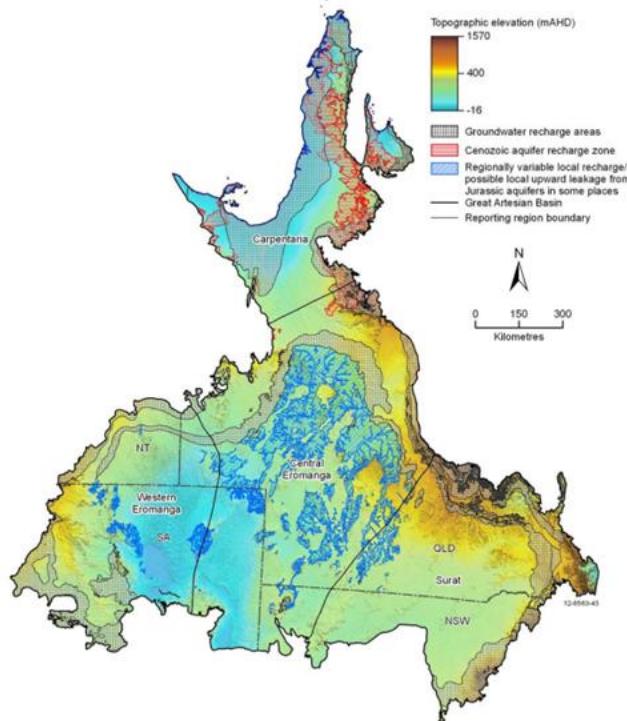


Figure 2.2 Digital elevation model with Great Artesian Basin boundary and aquifer recharge zones.

SoilFutures further mapped the recharge areas of greater significance, based on the amount of recharge per annum. It found that:

- the area with 1 – 5 mm/yr recharge is 65 064 km<sup>2</sup> (3.8% of the GAB)
- the area with 5 – 30 mm/yr recharge is 37 775 km<sup>2</sup> (2.1% of the GAB)
- the area with recharge greater than 30 mm/yr recharge is 2 847 km<sup>2</sup> (0.2% of the GAB)
- In NSW the recharge areas of higher than 5 mm/yr and >30 mm **are almost entirely contained within the east Pilliga area.**

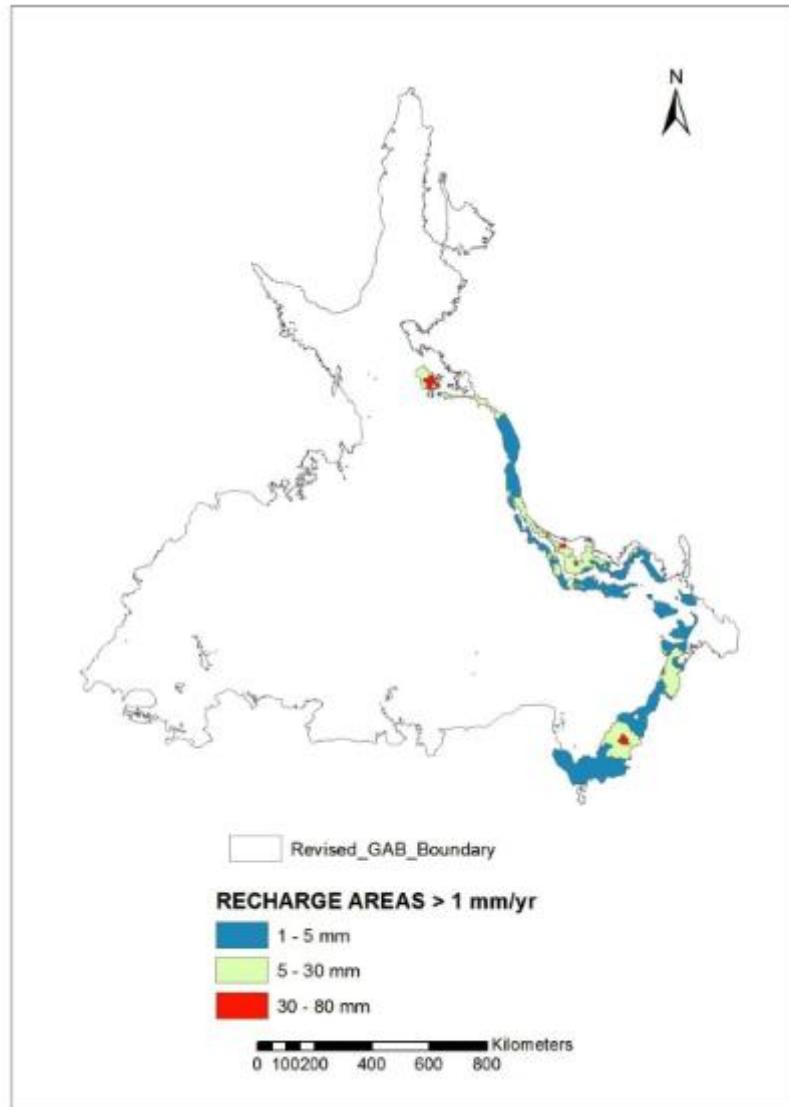


Figure 6: Machine digitised recharge zones from grid data provided in Figure 5.

Surface disturbance such as tree clearing and controlling vegetation along the pipeline route, horizontal drilling for pipelines as well as drilling through creeks and waterways in the recharge zone will impact the speed and levels of water recharge by permanently altering and disrupting the underground water flow.

<https://doi.org/10.4225/08/584c457b1676f>

#### **Crossing Under Power Lines**

There is insufficient information about exactly where the four locations are where the pipeline route will intersect with powerlines; 2 times across 11kV, once crossing the 66kV and once across 132kV line as the lines are not on the route maps. This is a gross oversight.

When a high pressure steel gas pipeline passes underneath a 132 kV electricity line, there is a risk of electrical induction. High voltage transmission lines create alternating electromagnetic fields that can induce AC voltage onto nearby buried pipelines. Under normal conditions this voltage is usually low, but it can still interfere with the cathodic protection system and can

create a shock risk for workers or locals who touch exposed sections of the pipeline. AC induction can also increase corrosion rates at coating defects if the pipeline is not properly earthed.

The highest risk occurs when there is a fault on the powerline, such as a lightning strike or a conductor-to-ground fault. In these events, large fault currents can travel through the soil and temporarily induce much higher voltages on the pipeline. This can overstress the pipe coating, cause localised heating at defects, or damage cathodic protection equipment. These risks are well known in the industry and can be managed by installing AC mitigation systems but these mitigation techniques are not mentioned.

### **Cathodic Protection System**

The Cathodic Protection System is located next to “Caloola” on the corner of Towri and Caloola Roads. It is not stated if this is powered by solar or electricity line upgrades are needed and this is key information for neighbours to understand.

### **Noise Impacts**

The safe levels for noise are anticipated to be broken hundreds of times according to Technical Report 5. Neighbours will frequently experience noise above safe levels and the only consolation given is that noise will be slightly reduced between 6am and 7am. Clearly this is a totally unsuitable solution.

It is also worth noting the noise impacts from horizontal directional drilling is loud and continuous, potentially for weeks. However no real details about the expected length of time and the fact that they will breach safe levels, has been provided to sensitive receivers. In the case of the HDD activities in the Pilliga, there are no sensitive receivers listed simply because no people live there. However sound and vibration and blasting will negatively impact a range of critters and these should be assessed in the EIS.

### **Threatened Species Will be Significantly Impacted**

We have seen for ourselves the existence of **Corben's Long Eared Bats** and **Glossy Black Cockatoos** within a stone's throw of the pipeline route on recent field surveys. Common bush sense and numerous other studies confirm that ploughing a 40m wide corridor through the habitat of these and other threatened species WILL HAVE A SIGNIFICANT IMPACT. While Santos would like to persuade the federal government that the farmland targeted by this proposed pipeline is lacking in biodiversity, this is far from true. In particular, we are familiar with an important rock formation that is a breeding ground and habitat for a range of bats, including the federally listed Corben's Long Eared Bat that has been found in this area. The bat shown in the photograph below was found along the proposed pipeline route, where it lives and breeds and deserves to be able to continue to do so.



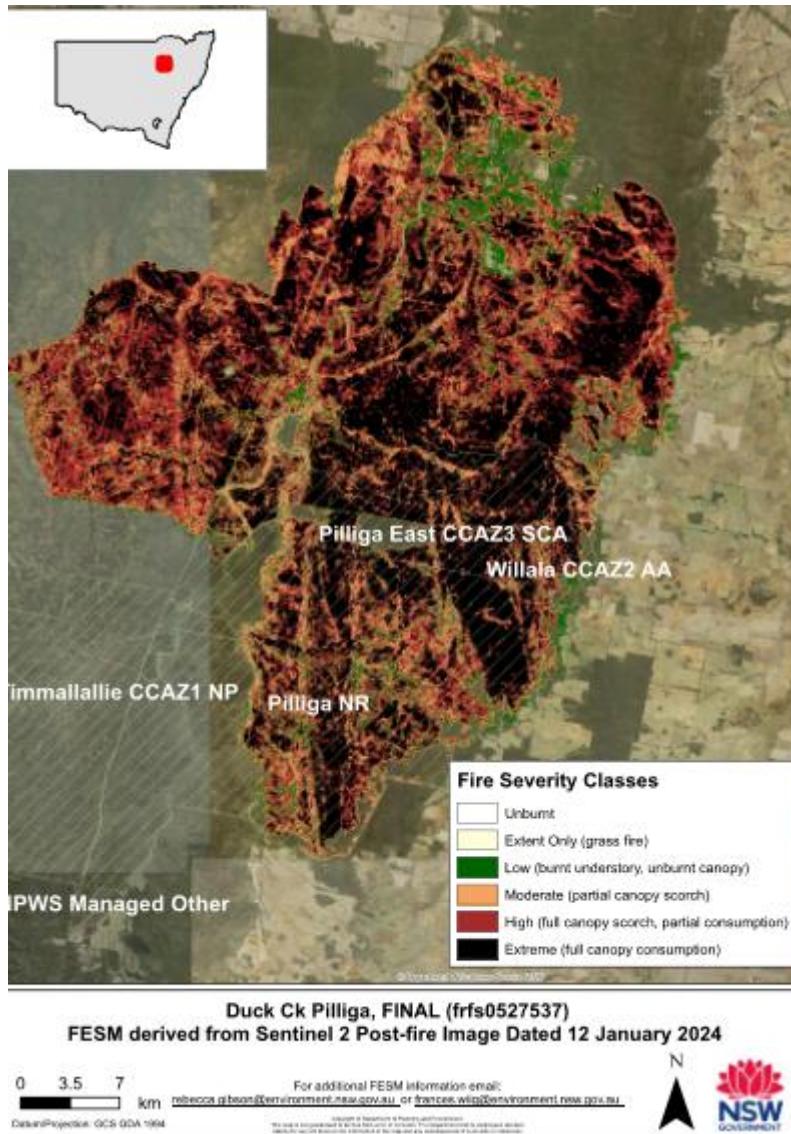
The fragmentation caused by a lateral splitting of 40km of the forest and 20km of farmland, has impacts far greater than just considering the area of the pipeline route as a percentage of the total area.

By Santos' own admission, the Narrabri Lateral Pipeline will also '*adversely affect habitat critical to the survival of the following threatened species and ecosystems: Koala, Pilliga Mouse, Grassy White Box Woodland, Corben's Long-eared Bat*' (see Appendices attached to the Referral). According to the Significant Impact Guidelines which apply, having an adverse impact on critical habitat means that there will be a significant impact.

Santos admit there are 28 threatened species and 3 threatened ecological communities that would be directly or indirectly affected by the NLP.

#### **The Duck Creek Fire Made Matters Worse**

In December 2023 our members were involved first hand in fighting the massive fires in the Pilliga Forest. It is gruelling to read that Santos wishes to use the fire and the huge area that it burnt as a way to diminish the environmental value of the area. In fact, the area now needs more environmental protection than ever. This fire (fuelled by climate change) is part of the very reason that the NLP must be a controlled action and attempts must be made to reduce its impacts on threatened species, who are under attack from many angles, many of which are caused by fossil fuel companies such as Santos. The map below shows the fire and how it occurred in the same place as the lateral pipeline is proposed.



### **NSW Net Zero Commission Coal Report:**

“Changes to the planning framework to require rigorous assessment of the greenhouse gas emissions and climate change impacts of mines should require consent authorities to:

- consider how the scope 1 and 2 emissions of the project would affect progress towards NSW’s legislated emissions reduction targets
- consider the project’s scope 3 emissions and their climate change impacts
- give significant weight to both considerations in the determination.”

### **Mitigation Measures**

In all, the mitigation measures in Appendix F are sadly lacking, almost looking like a desire to do as little as possible. Some highlights include:

- Provision of a dedicated land access advisor for impacted landholders - this should be an independent (LU2) and confidential service, not employed by the proponent. I note in

the renewables sector they have the [NSW Energy and Water Ombudsman](#) who handles consumer complaints about renewable energy and transmission projects and the [Australian Energy Infrastructure Commissioner](#) who handles consumer complaints about renewable energy and transmission projects. There should be equivalents for gas projects.

- As part of GHG minimisation efforts the EIS says it will investigate supplying a portion of the Baan Baa construction area's electricity with solar. This is a pathetic attempt in this day and age to reduce emissions. This site should be fully supplied by solar and a battery.
- Other GHG reduction efforts include seeking to switch off vehicles when not in use or use bio fuels. What a pathetic attempt. The project should use all electric vehicles.
- BD6 includes the use of a fauna spotter and catcher when clearing old growth forests, this is really not good enough and the clearing should not be done.
- BD7 notes that hollow bearing trees within 2m of the edge of the disturbance footprint will be considered to be left undisturbed i.e if there are not hollow bearing trees within 2m of the edge of the disturbance footprint this area will be disturbed. This would indicate that the disturbance footprint is at least 2 meters greater on both sides than just the disturbance footprint noted.

### **Alternatives**

On balance the Narrabri Lateral pipeline should not be approved for the reasons mentioned in this submission especially as there are other options for the supply of gas to the east coast gas market currently being considered by the Government. Most of the negative impacts of continuing with Lateral Pipeline would disappear if the Government chose to introduce a gas reservation policy or import gas through the Port Kembla import terminal.

Furthermore there is now strong evidence to show that batteries are removing the need for gas powered peaking plants in the National Electricity Market (NEM). Where batteries store excess solar and wind that is currently being curtailed (limited) from renewables these facilities create none of their own GHG emissions.

Wilga Park power station (powered by the appraisal gas from the Narrabri Gas Project) in 22/23 produced 143,000 MWh of electricity according [NGER](#) and created 81,776 tonnes of Scope 1 emissions.

By comparison the Stoney Creek battery currently under assessment for development at Narrabri, if fully cycled once daily, will store and provide when needed, about 365,000 MWh of electricity each year. This is more than double that provided by Wilga Park in a year, with no annual emissions.

Currently NSW and ACT's combined average daily gas consumption used for electricity generation according to AER ([here](#)) in the last 12 months has been 29 TJ/day or 10.59 PJ/year.

Other reports such as a 2021 [Northmore Gordon](#) report singles out NSW from the NSW/ACT numbers and puts gas consumption for electricity generation at 5TJ per day, or 1.8PJ/year.

Assuming that to generate electricity from gas it takes 10-12 GJ with an Open-cycle peaker (OCGT) to produce 1 MWh of electricity ([ref](#)).

The Stoney Creek Battery as a 1,000MWh battery, charging once per day from renewables and fully discharging once per day will therefore displace the need for 10-12 TJ/day of gas or between 3.6 and 4.4 PJ/year.

Depending on how much gas is used each year in NSW for electricity generation (1.8PJ through to 10.59PJ), it can be shown that the Stoney Creek Battery will displace (between 3.6PJ to 4.4PJ) anywhere between 34% to 244% of the gas currently used.

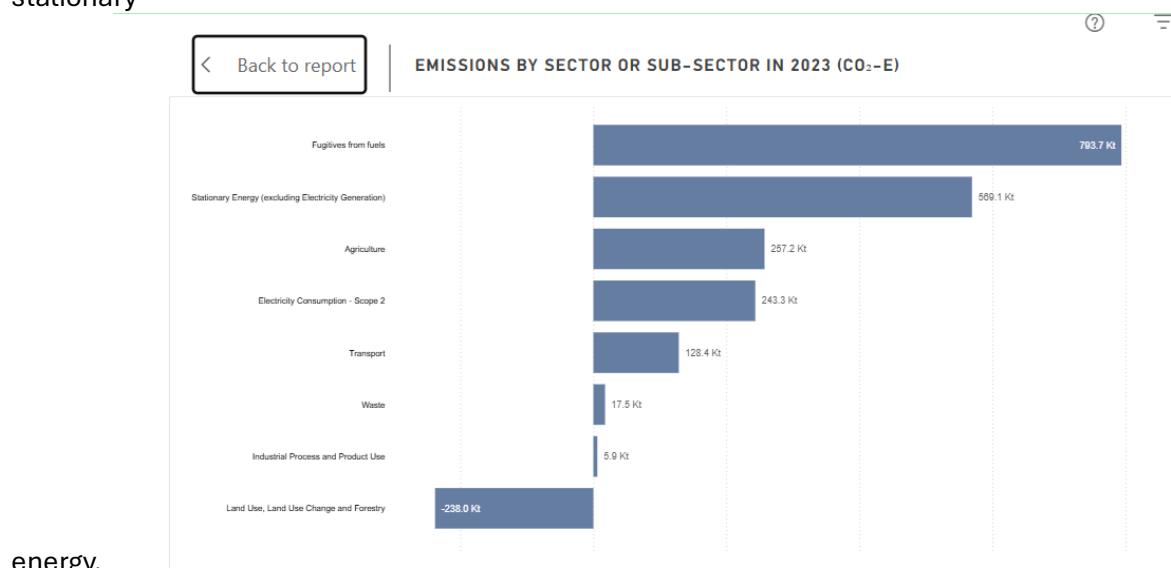
Recent media has shown this at a National Electricity Market (NEM) wide level as well with headlines such as "[Australia's battery revolution is pushing gas out of the grid support business](#)".

"Recent planning by the [Australian Energy Market Operator](#) (AEMO) indicates that the influence of batteries will continue to grow, and we contend will quickly outpace traditional gas and hydro resources in the coming decade.

In the National Electricity Market (NEM), a major milestone was reached when [large batteries discharged more energy in November than peaking gas generators](#) for the first time (Figure 1). This shift reflects both the rapid rollout of new battery projects and increased market volatility, which favours fast, flexible storage technologies."

### **Local Greenhouse Gas Emissions**

For Narrabri LGA, the need for a reduction in greenhouse gas emissions is particularly relevant due to our current massive per capita GHG footprint. Due to the comparatively large number of fossil fuel projects in the Narrabri Shire, the [NSW government SEED portal](#) shows Narrabri Shire LGA in 2023 was 1,777kt of scope one and two CO<sub>2</sub>-e, mostly from fugitives from fuels and stationary



With a current population of around 12,754, this is a per capita emissions profile of 139 tonnes of CO2-e per person. Compared with the NSW average of 114.5Mt in 2023 for a population of 8.6 Million people, which is a per capita average of 13 tonnes each. The Stoney Creek battery may play some role in bringing the Narrabri LGA per capita emissions down and having this outlined in greater detail by the proponent could be useful.

### **Conclusion**

For the reasons set out in this submission, People for the Plains strongly objects to the approval of the Narrabri Lateral Pipeline.

The EIS fails to demonstrate that the project is in the public interest. It does not adequately assess or address the full range of environmental, social and economic impacts that would arise from construction and operation of the pipeline, either in isolation or when considered alongside the numerous existing and proposed major projects in the region. In particular, the EIS is deficient in its treatment of social impacts, climate risk, cumulative impacts, water contamination risk, biodiversity loss, noise impacts and infrastructure safety.

The evidence presented shows that Santos does not have a social licence to proceed with further development in this region. Longstanding failures in community engagement through the Community Consultative Committee, and the systematic minimisation of community concerns, demonstrate that reliance on conditions of consent and non-binding consultation mechanisms is insufficient to protect community wellbeing.

The climate assessment underpinning the EIS is incomplete and misleading. By excluding upstream and downstream emissions, and by failing to assess the real world consequences of climate change for the Narrabri region, the EIS does not meet contemporary expectations for climate risk assessment.

The northwest NSW region is already experiencing severe climate driven impacts including prolonged droughts, major floods, extreme heat and bushfires. Approving new fossil fuel infrastructure that contributes to these risks is inconsistent with sound planning and the principles of ecologically sustainable development.

The risks to water resources are of particular concern. The proposed use of horizontal directional drilling beneath multiple watercourses, within a highly sensitive groundwater and Great Artesian Basin recharge area, presents contamination risks that have not been adequately assessed or mitigated. Given Santos' documented history of spills and leaks, the assumption that no water impacts will occur is not credible.

The impacts on threatened species and ecological communities are also unacceptable. Fragmentation of habitat across forest and farmland, disturbance of critical habitat, and additional pressure following recent catastrophic fires in the Pilliga Forest compound existing threats to already vulnerable species. Santos' own documentation acknowledges adverse impacts on habitat critical to survival, which by definition constitutes a significant impact.

Finally, the justification for the pipeline is undermined by the availability of viable alternatives. Policy options such as gas reservation and import terminals, together with the rapid deployment



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of batteries, demonstrate that energy security and grid reliability can be achieved without locking in further gas infrastructure and emissions. The evidence shows that batteries are already displacing gas peaking generation and can do so without the environmental and social costs associated with the Narrabri Lateral Pipeline.

On balance, the harms associated with this project substantially outweigh any claimed benefits. People for the Plains therefore calls on the Minister to refuse approval for the Narrabri Lateral Pipeline. At a minimum, the project must be referred to the Independent Planning Commission for a full, transparent and independent review of its impacts, with particular attention to climate risk, water security, biodiversity, social licence and cumulative impacts on the Narrabri region and NSW more broadly.