

David Quince
Landholder Tambar Springs
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This submission is an **Objection** to the Narrabri Lateral Pipeline.

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 Future of Gas 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.

Noted and Expert on CSG Gundi Royle of Moelis who was engaged by Santos to revise and give appraisal of Santos Gas Reserves on the Liverpool Plains / ie Pels 1 & 12 noted that these Pel's contained 14.5 % or greater of Santos LNG ambitions for the Gladstone LNG Export Facilities.

It is worth noting that she was horrified when she visited Australia from France to fulfill her contracted duties to Santos on inspecting the Liverpool Plains of the immense high Agricultural value this area contained and in her opinion was not an appropriate area for this Industry to operate in and actually invited concerned landholders from the Liverpool Plains who were actively opposing this proposed CSG development to enlighten and warn of her grave concerns and risks that would come with this Industry. Her credentials and expertise are beyond questioning.

I 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. Especially when considering that there already is a clear and both safer and cheaper alternative with Squadron LNG Port Kembla Facility virtually ready to supply any Gas needed to the Eastern Seaboard of both NSW & Victoria well before Narrabri can come online.

I 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.

“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 - 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.

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.

This Report was originally commissioned by the Landholders in one of the south western section of the Liverpool Plains , The Cox Creek Flood Management Area ie The Mullaley

Gas & Pipeline Accord when faced with a similar proposal from Eastern Star Gas who were consequently bought out by Santos with the same intentions and was classified as a State Significant Project but was ultimately rejected and withdrawn largely due to this Expert Report. I was the Chairman of MGPAA at the time and have been fighting & opposing such developments since 2009 which is ridiculous considering the irrefutable scientific evidence keeps mounting against this Industry in and on the Liverpool Plains { exactly where this proposed Narrabri Lateral Pipeline is situated }

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.

As well considering the announcements and statements made by Santos at their own AGM in 2018 where they misled not only their Shareholders , General Public and the ASX that they had NO Intentions of ever mining the Liverpool Plains & Pel's 1 & 12 when asked by myself of their recent comments in their Joint Partners "Carbon Minerals" annual general report that drilling and exploration would continue shortly in Pel's 1 & 12 / The Liverpool Plains.

The Transcript is on the Public Record and is irrefutable and only goes to the long list of serial Lies and Misleading Information that they continue to perpetuate ; running out of gas , gas shortfall , supporting a Gas Reservation Policy , normal Farming Practices won't be impacted by either their pipelines or associated infrastructure all quite incorrect as clearly shown in real time occurring in Queensland and in NSW with the Central Ranges Gas Pipeline.

If NSW Planning is to maintain any sort of respect or confidence with the General Public and the Business Community it must reject this proponents application as it is virtually identical to that of proposal Eastern Star Gas & Santos application back in 2009-10 through Cox Creek Floodplain / Narrabri to Wellington CSG Pipeline. So to maintain Continuity and Consistent Guidelines for Major Projects it must reject this Proposal.

Yours sincerely David Quince / Landholder Tambar Springs, NSW, 2381