

Submission to the NSW Department of Planning & Environment re: Narrabri Coal Seam Gas Utilisation Project (Wilga Park Power Station) Modification 4 - Beneficial Use of Coal Seam Gas from PEL 238

October 25, 2016

I wish to impart my objection to the proposed 'Modification to Narrabri CSG Utilisation Project, Narrabri Coal Seam Gas Utilisation Project (Wilga Park Power Station) Modification 4 - Beneficial Use of Coal Seam Gas from PEL 238'. SEE: <https://majorprojects.affinitylive.com/public/fbfc430e3d10795738c97786990438a0/Narrabri%20CSG%20Utilisation%20Project%20-%20%20Mod%204%20-%20EA.pdf>

I am against the "Expansion of Wilga Park Power Station near Narrabri from 11 megawatts to 40 megawatts." **I am against** intentions that "The power station would operate on coal seam methane gas that would be obtained from Bibblewindi pilot production program." **I am against** the so-called 'project' including "the construction and operation a gas gathering system consisting of approximately 3.5 kilometre of pipeline."

(http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=1238)

As is stated, "Santos is seeking approval for the following modification allowing: Use of coal seam gas from existing or future wells within PEL 238 at the Wilga Park Power Station consistent with the recent amendment to the Petroleum (Onshore) Regulation 2007. This would be in addition to the currently approved use of gas from pilots within PAL 2 and PPL 3"

(<https://majorprojects.affinitylive.com/public/fbfc430e3d10795738c97786990438a0/Narrabri%20CSG%20Utilisation%20Project%20-%20%20Mod%204%20-%20EA.pdf>). **I am fully against** this proposed modification, and any other dubious back-door attempts to extend the region into a coal seam gas field.

I am fully against Santos' use of coal seam gas that is claimed as being for 'explorative' use when it is clearly intended for production. The dubious calling such projects an 'exploration', thus not requiring a full and proper Environmental Impact Statement, reveals a vast oversight and injustice to the environment through misnomers, red-taping and loopholes. Harvesting and allowing gas produced from these so-called "exploration" projects (and 'pilot' wells) to be used for what Santos term 'beneficial use', is a dirty back-door way of increasing production and further contaminating this land and water (our habitat) with CSG fracking. CSG fracking has NO social licence! The people don't want it!

A summary of my main concerns include: the dangers of fracking, concerns over the contamination of the Great Artesian Basin, destruction of life and habitat, negative impact on property values, unacceptable light pollution around the Siding Springs Observatory, light pollution affecting Indigenous peoples' astronomy and creation stories, destruction of Indigenous heritage listed sites, approval of large scale water-use and waste-producing projects without an environmental impact statement or community consultation, maintaining a safe working site, high fire risk of gas flares and leaks, and negative health impacts of mining.

My main areas of concern regarding unconventional gas mining and mining are as follows:

- the **dangers of fracking** are well documented. Many of the chemicals used in the fracking process are highly toxic and cause long-term damage to our sensitive environment systems. The process of fracking also is inherently dangerous, allowing trapped gases to escape and force their way to the surface through fissures. SEE: https://en.wikipedia.org/wiki/Hydraulic_fracturing, and <http://www.healthline.com/health-news/fracking-fluid-contains-highly-toxic-chemicals-081314>, and https://www.earthworksaction.org/issues/detail/hydraulic_fracturing_101#.VsGD7bR97VQ, and <http://www.scientificamerican.com/article/5-facts-to-know-about-the-california-methane-leak/>, and <http://www.abc.net.au/news/2016-02-14/condamine-river-mysterious-bubbling-intensifying-landholders-say/7139676>. *The concept that Australia is supposedly following “world’s best practice” for CSG mining is a fiction that cannot be substantiated.*
- **contamination of the recharging Great Artesian Basin** aquifers and contamination of surface and ground water systems. This is of major concern. There are several recent and current court cases concerning water quality and water issues against this insidious industry: *People for the Plains v Santos and Others*; & *Mullaley Gas, and Pipeline Accord Inc v Santos*; & *Watts v Department of Planning and Environment*; & *People for the Plains v Santos and Others*. Ongoing court cases concerning water quality continue, with the citizenry sadly forced to fight against either corporations or the State for the basic right of clean water. SEE: http://www.edonsw.org.au/current_cases, and <http://theconversation.com/groundwater-the-natural-wonder-that->

[needs-protecting-from-coal-seam-gas-41978](#). Any work on any CSG sites currently before the courts should cease until there is a legal resolve. No CSG production should be allowed. Water is life. Once contaminated it can never be healed. The Great Artesian Basin covers an extremely vast area, SEE: https://en.wikipedia.org/wiki/Great_Artesian_Basin.

- ongoing **destruction of life and habitat** for mining purposes indicates the clear need for more effective protection measures. For example, in the Pilliga there are 25 nationally-listed and 48 state-listed threatened flora and fauna species. As a civilised society, we cannot knowingly allow this environmental destruction to continue, when low-impact renewable energy sources are readily available. SEE: <https://www.wilderness.org.au/campaigns/pilliga-forest>, and <http://mobile.abc.net.au/news/2016-02-15/coal-miner-to-resume-clearing-of-northern-nsw-forest/7167834>, and <https://www.environment.gov.au/biodiversity/threatened>, and <http://www.environment.gov.au/cgi-bin/sprat/public/publicthreatenedlist.pl?wanted=fauna>, and <https://www.wilderness.org.au/articles/study-proves-pilliga-forest-noahs-ark-threatened-species>, and <https://www.environment.nsw.gov.au/resources/parkmanagement/SMI/20140213SMIPilligaNPandSCA.pdf>, and <http://www.environment.nsw.gov.au/determinations/ClearingNativeVegKTPListing.htm>. We need to effectively protect ALL our endangered and threatened species for the benefit of biodiversity, healthy ecosystems, and future generations. Stronger environmental protection measures need to be undertaken.
- There is a **negative impact on property values** near gas fields, ie plummeting land values. People's homes, land and livelihoods have been made worthless, with many trapped in mortgages, forced by financial circumstance to remain living in unacceptable gas field conditions. SEE: <http://coalseamgasnews.org/news/world/australia/nsw/cant-sell-cant-insure-in-a-gasfield-auspol/>, and 'Open for Business' <https://www.youtube.com/watch?v=NIEUFQIXGFc>. There is a great deal of evidence of the negative impact on land valuations in gas field and boom-to-bust mining regions of Australia. This wasteland creation of people's communities, homes and livelihoods is un-Australian, unfair and inequitable. Prime farmland, particularly, is at risk.

- **Siding Springs Observatory** already experiences excess light pollution from the one existing 5m high with a 3m flame height gas flare, which puts out as much light pollution as the whole township of Coonabarrabran. Santos has plans for the implementation of 850 gas wells with five 50m high 30m flame height gas flares. This will impact negatively on the Siding Springs Dark Skies recognition as Australia's first IDA-recognised Dark Sky Park. Santos should not be given ability to further extend CSG exploration or production. SEE: <https://www.aao.gov.au/public/dark-skies>, and <http://rsaa.anu.edu.au/observatories/siding-spring-observatory> *This is a world-leading astronomy site, and light pollution caused by gas-flaring is unacceptable!*
- **Indigenous peoples' astronomy and creation stories** will be negatively impacted by increased light pollution caused by gas flares, impeding the ability to see the Emu in the Sky, a constellation defined by dark nebula that enables tracking of seasonal changes. Any increased light pollution is thus an affront to our First Nations' cultural and spiritual rights and traditions. SEE: <http://theconversation.com/darkness-is-disappearing-and-thats-bad-news-for-astronomy-51989>. *This land is Aboriginal land; never ceded. We could learn a lot by listening to our First Nations peoples' and respecting their cultural and spiritual rights and traditions.*
- **Indigenous heritage-listed sites** are still being actively destroyed by mining corporations, with the government deliberately de-listing Indigenous heritage sites in favour of short-sighted exploitative corporations. Indigenous peoples have a right to practice their spirituality, and heritage-listed sites are integral to their epistemologies. Indigenous heritage-listed sites must be effectively protected against destruction. SEE: <http://www.abc.net.au/indigenous/stories/s3274867.htm>, and <http://pateblog.nma.gov.au/2014/07/30/toxic-tales-from-the-pilliga/>, and <https://www.whitehavencoal.com.au/environment/docs/part-5-aboriginal-heritage-assessment-b.pdf>. *This land is Aboriginal land; never ceded. We could learn a lot by listening to our First Nations peoples' and respecting their cultural and spiritual rights and traditions.*
- Santos' Leewood Waste Water Treatment Plant was approved without an **environmental impact statement or public consultation**. The plant has a treatment capacity of 300megalitres/day, when 500megalitres/day of toxic

waste liquid is expected at capacity, so it clearly cannot manage its waste effectively. Even the Environmental Protection Authority has warned the ponds would be full in three years. Santos' 'pilot' so-called 'exploration' project should require full EIS, as it is clearly intended for production capacity. Santos state: "As exploration and appraisal continues within PEL 238 and PAL 2, approval for installation of additional pilot wells and supporting infrastructure may be sought."

(<https://majorprojects.affinitylive.com/public/fbfc430e3d10795738c97786990438a0/Narrabri%20CSG%20Utilisation%20Project%20-%20Mod%204%20-%20EA.pdf>). SEE:

[http://www.edonsw.org.au/people for the plains v santos and ors](http://www.edonsw.org.au/people%20for%20the%20plains%20v%20santos%20and%20ors), and <http://www.abc.net.au/news/2015-05-21/narrabri-coal-seam-gas-project-hits-hurdle/6488504>, and <http://www.smh.com.au/environment/santos-plan-for-csg-wastewater-cops-government-agency-flak-20150521-gh6fva.html>.

This is an outrage. Work should not be allowed to continue on Santos' projects that are clearly operating beyond 'pilot' or 'explorative' capacity, without following proper due procedures of Environmental Impact Statements.

- **maintaining a safe working site** is essential, however exploitative corporations like Santos have already demonstrated an inability to uphold safe practices. SEE: <https://www.epa.nsw.gov.au/licensing/investigations.htm>, and <https://www.epa.nsw.gov.au/epamedia/EPAMedia16010501.htm>, and <https://www.epa.nsw.gov.au/epamedia/EPAMedia14021802.htm>, and [http://www.edonsw.org.au/defending the pilliga in court](http://www.edonsw.org.au/defending%20the%20pilliga%20in%20court). *It's simply not good enough that they be allowed to continuously neglect their duty of care.*
- The **fire risk** caused by gas flares, venting and 'accidental' gas leakage issues, particularly during bushfire season, on days of high fire danger, or during a Total Fire Ban when even the gas flares will still be actively burning, is both extreme and inequitable. SEE: <https://independentaustralia.net/environment/environment-display/santos-csg-flaring-on-the-pilliga-makes-a-mockery-of-total-fire-ban,8468>. *As a former volunteer RFS firefighter, having served two separate stints in the Pilliga during Section 44s, I am well aware of the hazards and risks associated with fire in this region. Gas flares and potential gas leaks endangers both life and the environment.*

- the evidence on the **negative health impacts** of the CSG and mining industries is prolific. SEE: https://www.youtube.com/watch?v=Kvfzz7_nbqs, and <http://ecowatch.com/2016/02/13/mark-ruffalo-fracking-not-safe/>, and <http://www.abc.net.au/news/2016-02-12/coal-miner-disease-resurgence-in-queensland-senate-inquiry/7161694>. *This is acceptable to our citizenry.*

I appeal to those in authority to take note of the seriousness of these issues and realise your ability to act in the public, not corporate, interest. We must consider the bigger picture, ie the wellbeing of our nation State, our environment, and our people. Citizenry morale is at an all-time low, and this is largely due to ineffective/bad leadership and poor exempling. We must ensure the tenets of civic rights are upheld and outweigh the richly squeaky voice of corporate swill. Remember, that in a liberal democracy, the voice of the populace **MUST** have greater weight than the jangly pockets of big bad polluting corporations who couldn't care less what, who or where they exploit for profit.

CIVIC RIGHTS NOT CORPORATE WRONGS

Yours in Sincerity,

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