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26 October 2016

To: Rose-Anne Hawkeswood
Department of Planning and Environment

Submission: Narrabri Coal Seam Gas Utilisation Project Modification 4
(MP07_0023 MOD 4)

Thank you for the allowing comment on the proposed modification of the Narrabri Coal Seam Gas Utilisation Project. This is a submission opposing the application.

We hold serious concerns about this application and fear that its approval would amount to Santos undertaking CSG production and commercial exploitation of the resource under an exploration license and assessment process. We believe there has been an inadequate level of information provided for an informed and responsible decision to be made about the potential impacts of this modification.

Santos' application is under s75W of the *Petroleum (Onshore) Regulation 2016*, which "*enables the beneficial use of natural gas from petroleum exploration lease areas subject to relevant thresholds and criteria.*"

The potential scope of work possible for Santos under an approval of this modification are ill defined and unquantified. Santos' Modification 4 application lists 28 wells in PEL238 under this application for beneficial use, but significantly, states that, the "*modification application applies to any existing or future approved pilot wells within PEL 238*". This is an application for the productive and commercial use of an unquantified amount of coal seam gas from PEL238. This is in stark odds with the spirit of improved regulatory oversight outlined in the NSW Gas Plan and the expectations of the NSW community.

Furthermore, under Section 16 of the *Petroleum Onshore Regulation 2016*, the beneficial use of a CSG resource granted under development consent is not subject to any time constraints. Gas used under development consent is also exempt from the requirement to pay royalties. If this modification application is approved this could mean that Santos could use gas produced from exploration wells from

anywhere within PEL238 for a productive, commercial use, indefinitely and without paying any royalties to the state of NSW.

Santos' modification application provides no information about how much gas will be used or whether it would be otherwise flared. The beneficial use of gas provision is claimed to benefit the environment. How is the community to know there is any net benefit to the environment if there is no information that the gas used to power Wilga Park would have otherwise been extracted and flared? If this modification is approved there will simply be no way for the public to know if gas from current or future CSG wells used at Wilga Park was really an exploratory by-product or if it has actually been extracted for productive purposes.

Santos must be required to provide a clear and detailed plan of its intended activities, including thorough environmental, social and economic impact assessments, before any approval for CSG production is granted. The approval of this current modification application would amount to CSG production, and must not be approved without undergoing assessment processes required for a producing gasfield. It is not acceptable that CSG exploration continues indefinitely whilst Santos utilises this gas for productive and commercial benefit, and without the environmental assessment and public input required if the activity were properly assessed, as a producing gasfield.

Any activity that amounts to CSG production must be assessed with a thorough EIS and full public consultation.

Sincerely,

Naomi Hodgson
Campaign Manager
The Wilderness Society, Newcastle