

## **Make a submission: Narrabri Coal Seam Gas Project**

Santos has an Environmental Impact Statement (EIS) on exhibition seeking public feedback on its plans for an 850 well coal seam gas (CSG) production project in the Pilliga forest and adjacent farmland near Narrabri. We've made a guide to help you make a submission.

**Submissions must be lodged by 22 May 2017.**

**You can do that online here:**

[http://www.majorprojects.planning.nsw.gov.au/index.pl?action=view\\_job&job\\_id=6456](http://www.majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=6456)

**Or send your submission by mail:**

Attn: Executive Director, Resource Assessments  
Department of Planning and Environment  
GPO Box 39  
Sydney NSW 2001

### ***What is being proposed?***

The project is the largest development ever proposed under the modern planning system, and four times the size of the only other two CSG projects assessed and approved in NSW.

Santos proposes up to 850 wells on 425 well pads over 95,000 hectares. This is more than four times the size of either of the previously approved CSG projects in NSW. The proposal includes a gas processing facility for compression dehydration and treatment of gas, a water management facility for storage and treatment of produced water and brine, possible additional power generation on site, continual flaring (burning off of gas) at two locations, an infrastructure corridor through the forest between Leewood and Bibblewindi, expansion of worker accommodation, discharge of waste water into Bohena Creek, irrigation with treated water and landfill burial of tens of thousands of tonnes of salt. **It's huge.**

Santos says construction is expected to start in early 2018, with first gas scheduled for 2019/20, but also make clear it has not decided to go ahead with the project at all. If it goes ahead, it will continue for at least 20 years.

**Here are some things you might want to raise in your submission:**

**Make sure you state up front that you are making a submission on the Narrabri Gas Project and that you OBJECT to it.**

**The lack of detail:** Santos' EIS is very short on detail. It does not provide maps indicating where these 850 wells and the lines and infrastructure that run between and around them will go. Santos is seeking a blank cheque consent for this gasfield on the promise that it will decide where the wells will go afterward using a "Field Development Protocol." No project has ever been assessed this way before in NSW and the constraints Santos propose are weak and subject to change later on. This is not an appropriate way to assess the largest development project ever undertaken under the Environmental Planning and Assessment Act and the Government must insist that Santos release details to the public about the placement of its wells, pipelines and some other infrastructure.

**There's no justification:** The significant harm on the social, environmental and economic values of the Narrabri Shire and New South Wales that this project will inflict needs to be weighed against the economic justification for the project, but there is no such economic justification. Santos is one of several large gas companies that threw the east coast gas market and the industries that rely on it into turmoil by opening up CSG fields in Queensland and contracting to sell more gas than those fields can produce to overseas customers. They drove up the price of gas and are plundering supplies previously available to manufacturers and power stations.

The gas produced at Narrabri might be as little as 4.9% of the volume contracted for sale out of Gladstone. It's not going to bring down prices. In fact, it will force prices up, because unconventional gas like CSG is so expensive to produce and yields are so low. Research undertaken by gas company AGL shows that gas from the Pilliga would be the most expensive gas of anywhere in the current east coast gas market. The number of jobs the project will support once the construction is over is just 145. Weighed against damage to the land, and the Great Artesian Basin, this makes no sense. We need sustainable jobs, not plunder for profit.

**Groundwater and the Great Artesian Basin:** Santos' project is expected to remove 37.5GL of groundwater over the life of the gasfield, mostly in the early years. The coal seam needs to be dewatered to release the gas, but this aquifer lies beneath the Pilliga Sandstone, part of the Great Artesian Basin recharge. Santos' EIS admits that the project will result in a loss of water from the GAB recharge aquifer over time. CSG in Queensland has drawn down GAB aquifers already. We can't afford to risk this crucial resource.

**Salt:** The water removed from the ground by Santos will be treated, but this creates another problem: what to do with the salt? Peak salt production at Narrabri CSG will be 115 tonnes *per day*, or two and a half B-double truckloads per day. In the peak year, this would mean the creation of 41,900 tonnes of salt for disposal, which Santos says will take place in landfill.

**Cultural heritage and the Pilliga:** The Pilliga is a spiritual, cultural and social icon for Gomeroi/Gamilaraay people. Fragmentation and industrialisation cuts people off from their heritage and connection to country.

**Biodiversity and the Pilliga:** The Pilliga is also the largest temperate woodland in New South Wales. Santos propose clearing nearly 1,000ha of the Pilliga, including habitat for critically endangered Regent honeyeater and for koalas, which are already in decline in the Pilliga. Spread across the whole forest, this clearing will fragment much larger areas of habitat. The gasfield will clear breeding habitat for Pilliga Mouse, which lives nowhere else, and breeding habitat for other wildlife. It will fragment and degrade the forest. Without specific information about where the wells and lines will be located, a proper ecological impact assessment can't be completed. Regardless, the Pilliga is a cherished natural and cultural icon and must be protected from becoming an industrial gasfield.

**Social and health impacts:** Santos' social impact assessment is three years old and utterly inadequate. The compendium of health studies produced by the Concerned Health

Professionals of New York shows mounting evidence for health damage by unconventional gas operations, including water contamination and respiratory illness. The Government must insist that Santos conduct a proper health impact assessment including modelling exposure pathways, reviewing literature and engagement with the Narrabri community. In Narrabri, this project will have negative impacts on cost-of-living, the labour and housing markets. The latter is cited in as a *benefit* of the project but it will not benefit low-income renters. The effect of the project on cost-of-living in the Shire needs to be modelled, assessed and considered, as do the labour dynamics of the project. The project entirely surrounds Yarrie Lake, and Santos propose that wells might come as close as 200m from the Lake.

**Air quality:** The air quality assessment fails to include health-damaging fine particulate pollution with a diameter of 2.5 microns or less (known as PM2.5). With diesel generators at each well pad and at the water treatment and gas compression plants, there will be significant PM2.5 emissions. The air quality assessment and greenhouse section also fail to model the likely substantial escape of fugitive methane emissions.

**Dark sky:** light pollution from flares, compressor stations and the water treatment plant will ruin the dark sky needed by the internationally renowned Siding Spring Observatory.

**Climate change:** recent research by the Melbourne Energy Institute shows that Australia may be dramatically under-estimating the fugitive methane emissions from unconventional gas, including coal seam gas. It's not needed or useful as a source of energy: we have the technology we need to replace gas with renewable energy sources.