

I object to the Narrabri Gas Project on the grounds that Santos has not properly assessed the major hazards and risks of the project, in that it has incorrectly applied the techniques of EPP33 and HIPAP 4, when the correct legislation it needs to comply with is Chapter 10 of the Work Health and Safety Regulation 2011 – Major Hazard Facilities.

EPP33 and HIPA4 are no longer the relevant legislative standards applicable to major gas/LNG processing plants in NSW. The correct legislation is the Work Health and Safety Act.

Leewood gas processing plant needs to be regulated as a licensed major hazard facility and undertake safety case assessment as required by the Work Health and Safety regulation 2011. Santos will be handling over 10% of a 'Schedule 15' chemical i.e. methane. In addition, the gas processing equipment, wells, compressor stations will generate air toxics which need to be adequately safety-cased.

This legislation requires notification to WorkSafe NSW, licensing and production of a detailed safety case to ensure onsite and offsite risks to the public, workers, property and the environment are MINIMISED (as low as reasonably practicable).

The tests applied by the guidelines EPP33 and HIPAP4 are INADEQUATE to ensure safety and risk minimisation to the nearby suburbs of Narrabri. It is noted that a primary school, Narrabri West, is within a few kilometres of the active gas field and approximately 10 kilometres from the Leewood gas processing facility.

Santos has not adequately assessed, and as a consequence, not adequately mitigated the risks to the public, workers, plant and the environment of methane explosion, catastrophic toxic untreated produced water loss of containment, catastrophic air toxics cloud production and plant failure such as well blow outs, pipeline rupture, gas processing plant failure, compressor failure etc.

The Project should be rejected out of hand as inadequately assessed.

I note that even using the incorrect and out-dated legislative techniques, Santos has identified at least one 'sensitive receptor' 350 metres from the boundary of Leewood at risk from 'uncontrolled containment of gas'.

Further, Santos has identified a 'moderate' level of bushfire risk with a potential to cause large bushfires. Again, this risk has been subjectively assessed and claimed mitigation measures are un-tested. Santos's own subjective 'risk assessment' may not be acceptable to the surrounding community and inadequate to ensure protection of bushland areas.

There is no analysis whatsoever of lack of containment of air toxics from either catastrophic or normal operation of the gas processing plant at Leewood.

Santos has failed to adequately assess the safety of the untreated toxic coal seam gas produced water dams which are proposed to be re-built at Bibblewindi, nor of the risk of flood or loss of containment at the vast Leewood brine storage dams. Both of these areas risk contamination of the Namoi catchment area and the Narrabri town water source.

Unless an adequate safety case is approved by WorkSafe NSW in accordance with licensing requirements of the Major Hazard facility regulations, this project must be rejected out of hand and NOT approved .