

Submission in response to Santos' Narrabri Gas Project EIS

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

May 16, 2017

I am against the Santos' Narrabri Gas Project.

CSG fracking has NO social licence! The people don't want it! It's high time the "government" stopped pandering to big business and started acting in the public and civic interest! We want basic HUMAN RIGHTS to clean air, land and water.

A summary of my **main concerns** include: the dangers of fracking, concerns over the contamination of the Great Artesian Basin, unacceptable levels of water usage and produced waste products, 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, a lack of separation of powers between the State and corporations, approval of large scale water-use and waste-producing projects without an environmental impact statement or community consultation, inability to maintain 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.*
- unacceptable levels of **water usage and produced waste products** will This project will extract over 35 billion litres of groundwater, much of it in the first five years. This water will be treated and in the early years will generate tens of thousands of tonnes of salt that needs to be disposed of. Using waste water for irrigation or spraying produced water on public roads is not acceptable. SEE: <http://www.smh.com.au/environment/santos-csg-wastewater-to-top-1-million-litres-a-day--with-nowhere-to-go-20150327-1m91rz.html>, and http://www.lockthegate.org.au/revealed_epa_investigation_report_shows_e

[xtent of pilliga contamination](#), and <http://pilligapush.com/ian-suttons-submission-in-response-to-santos-narrabri-gas-project-eis/>, and http://www.chiefscientist.nsw.gov.au/data/assets/pdf_file/0017/44081/O_CSE-Final-Report-Stuart-Khan-Final-28-May-2014.pdf. *The massive amount of water usage is completely unacceptable and inequitable, and the associated waste products such as toxic water and residual salts, further adds to the obvious negative impacts of this project. Spraying this contaminated water on roads or using it as irrigation is unacceptable.*

- 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> and http://www.edonsw.org.au/defending_the_pilliga_in_court. *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. The Gamilaraay peoples are fully opposed to this project.

- **A lack of separation of powers** between the State and vested corporate interests undermines the basic tenets of a representative democracy. Rather than citizens, we are now the victims of neo-liberal corporatism with no means of keeping powers in check, as government agencies are increasingly sponsored by corporations and vested interests. Australia's media oligopoly also have vested interests and no longer serve to function as 'the fourth estate' where media should keep check on excesses of power as a service in the public interest. Our system of representative democracy is seriously undermined and flawed. SEE: <http://www.abc.net.au/news/interactives/tables/aec-political-donations-table/>, and <http://www.abc.net.au/news/2014-12-08/anti-csg-group-angry-at-santos-logo-used-on-qld-police-cars/5953030>, and <http://periodicdisclosures.aec.gov.au/AnalysisDonor.aspx>, and <http://theaimn.com/democracy-diversity-media-ownership-australia/>, and https://en.wikipedia.org/wiki/Concentration_of_media_ownership. *As a well-educated postmodern feminist, I find it extremely distressing that civil society has been foregone. Civic rights are being constantly undermined, our freedoms curtailed, our public services cut or sold off, and our dog-eat-dog form of Hobbesian economic-liberalism selfishly serves to widen the gap between rich and poor, corporate or civic interest. In our local government election, a poll of our region voted 87% against CSG, yet this closest voice to the people is ignored by the state and the nation State. Although my government continues to act contrary, I still hope for a clean energy future in a fair and equitable good Australia.*
- Santos' Leewood Waste Water Treatment Plant was approved without an **environmental impact statement or public consultation**. The plant has a treatment capacity of 300 megalitres a day, when 500 megalitres a 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, 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 repeatedly 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. *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 firefighting 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 unacceptable to our citizenry.*

I object to this project and believe it should be rejected. 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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