

I object to the Narrabri Gas Project.

#### 1. Flawed process

I am an ordinary Australian citizen.

I do not have teams of lawyers or paid environmentalists to write or read 7,000 pages of EIS documents. I work from the kitchen table at night after tea.

As an ordinary tax payer I cannot make political donations to the major parties to buy the outcomes I want.

I cannot offer politicians post-parliamentary positions on the board of my company so they can use their influence in the corridors of power to advance my company's interests over those of ordinary Australian citizens. I have no such company.

I hope that you will, nevertheless, take note of my submission in this David & Goliath contest which sees ordinary Australians dig in against their own govt. and Santos over the Narrabri Gas Project.

I fear that submissions opposing the project will not be heeded and worry that the call for public submissions is window dressing.

Why?

Shortly after Santos released their EIS I heard an interview with the member for Barwon, Kevin Humphries, on ABC radio. He said of the Narrabri Gas Project: "There might be a little bit of grandstanding but at the end of the day the project will go ahead and I'm highly supportive of it." <http://www.abc.net.au/news/2017-02-23/narrabri-coal-seam-gas-proposal-will-go-ahead-says-nationals-mp/8296794>

He pre-empted the outcome of the Planning and Environment process - "The project will go ahead". Very concerning to me, it means it is already a done deal.

#### 2. Time taken to produce the EIS is not relevant.

Kevin Humphries also said ""The environmental impact statement that Santos have worked up has taken several years" as if this automatically makes it good. I wish to point out that time taken to produce the document is not an indicator of anything except the time taken to produce it.

#### 3. Length of EIS is not relevant

The 7,000 pages is not doubt meant to be impressive but I urge you to resist being subconsciously impressed by size. I suspect that the excessive length of the document is more a weapon against opposition than an attempt at really covering the environmental bases. Santos know their opposition is ordinary people trying to grapple with this around the kitchen table after tea then doing the farm BAS before midnight and the next day's work.

#### 4. Size of gas field

This is the thin end of the wedge. If the Narrabri Gas Project is approved Santos will then use it as leverage to extend their operations to the rest of their licences in that area. This is the domino effect of CSG which we have seen in numerous other cases (like Qld). If you allow this project to go ahead you are de facto approving CSG across the whole area. It's some of the best farming country in Australia.

#### 5. Farming vs CSG

Q. How can you run a centre pivot over a gas well? A. You can't.

Q. How can you farm your country when the water flow has changed because

roads to gas wells now criss cross your land and act like levees? A. You can't.

Q. What happens when the CSG that comes up under its own pressure is exhausted and all that infrastructure is just sitting there unproductive? A. Santos will want to start fracking to get gas up.

Q. What happens to the Great Artesian Basin when fracking chemicals get into the water? A. It's bugged. For good and all. No amount of remorse will bring it back.

We hear a lot of cant and stock phrases like "mining and agriculture can co-exist" but just saying something doesn't make it true. Not even if you're a politician.

#### 6. World's Best Practice

We keep hearing about World's Best Practice but if World's Best Practice is slipshod and inadequate then a company, such as Santos, promising to deliver World's Best Practice is promising not much.

World's Best Practice includes not having any plan for the salt from "produced water" from the Narrabri Gas Project. That salt will be trucked to landfill and dumped to become someone else's problem. It could be coming to your town. Or mine. When asked about this in an ABC radio interview Peter Mitchley, Santos' General Manager NSW, would not say where it would go. Whether they haven't thought about it or whether they just don't want people to know? That's World's Best Practice.

If you accept (as I do) that allowing CSG will lead ultimately to fracking this is relevant: <http://www.ecowatch.com/confirmed-oklahoma-earthquakes-caused-by-fracking-1882034344.html> The US Geological Survey has linked fracking to the huge increase in earthquakes in America.

#### 7. Divine Right

There is the perception by Santos and govt. that just because Santos have already spent millions this gives them an automatic right to have their project approved. I hope the Planning and Environment process does not share this view. What about the millions that farmers have invested in their industry? Why don't they have the automatic right to continue farming? Why is CSG more privileged than agriculture and allowed to destroy it? Agriculture is a proven industry already operating successfully in the region Santos threatens. In my opinion it is a far nobler and more beneficial industry than CSG. People continue to need food and fibre and the area that Santos have licences over is some of the best agricultural land in Australia.

#### 8. Social License

No matter how much money Santos put into the football team or girl guide halls, etc they don't have social license. You can't buy that. It's like trust - the only way to get it is to earn it and Santos have not earned it. (They are not trusted either, by the way.) This is patently clear in the division in the town that has come with Santos' unwelcome project. More advanced cases can be seen all through the gas belt in Qld where communities have been destroyed by the gas industry, people have committed suicide over the effects that CSG has had on them, their families and their farms.

#### 9. Ruination of the Countryside and Loss of Amenity

I live in rural Australia. If I wanted to live in an industrial wasteland I would move to one. If the Santos project is approved I will have an industrial wasteland

forced upon me.

#### 10. Stakeholders

Kevin Humphreys & Peter Mitchley have both inferred or said outright that people who don't live in "the area" have no right to a say on this.

Wrong.

In Australia we have freedom of speech, of course we have the right to have a say on this. Stakeholders have been narrowly defined - no doubt in an attempt to discredit opponents. One could even suggest that The Pilliga has been chosen as Santos' first project in this basin precisely because it is sparsely populated. But there are plenty of precedents where people living elsewhere have fought against bad policies concerning a particular place, for example Lake Pedder in Tasmania. As Australians we have the right to do this whether we live there or not.

#### 11. Political Donations

On the internet someone asked why Santos has donated money to political parties, they asked "what are they buying". It makes you think, because public companies don't spend money on philanthropy - they want something for their money. and Santos have paid a lot.

<https://newmatilda.com/2012/02/06/gas-drillers-bring-heavy-hitters/>

<https://www.getup.org.au/campaigns/coal-seam-gas/the-santos-law/no-special-laws-for-santos>

<http://parlinfo.aph.gov.au/parlInfo/search/display/display.w3p;db=CHAMBER;iid=chamber%2Fhansards%2Faf5e9bce-9bd9-45dc-bd87-c1d5218a5d66%2F0186;query=Id%3A%22chamber%2Fhansards%2Faf5e9bce-9bd9-45dc-bd87-c1d5218a5d66%2F0000%22>

<http://www.abc.net.au/news/2016-02-01/political-donations-parties-data-search/7129064>

<http://www.theland.com.au/story/3991134/santos-under-the-microscope-over-undisclosed-political-donations/?cs=4951#!>

#### 12. Health

CSG is like smoking - it's not illegal but it's bad for your health. Plenty of anecdotal evidence for this and increasing amount of scientific evidence. We don't want it: NIMBY not in my backyard. I don't wish it on anyone else, either.

#### 13. Methane

We've all seen the footage of Jeremy Buckingham lighting up the fugitive methane in the Condamine River in Qld. That methane comes from the CSG industry there. Methane leaks out and when you put down what is essentially a bore to bring it up to the surface it's hardly surprising. Why allow this in the first place. It's such a dirty industry and we'd be far better off without it.

From the article at

<http://www.independent.co.uk/environment/gas-power-plants-methane-emissions-120-times-more-study-purdue-edf-greenhouse-global-warming-climate-a7641471.html>

"Gas power plants can emit up to 120 times the levels of methane reported by companies to regulators in the United States, according to new research"

No doubt that's World's Best Practice - what Santos will aim for (see above).

"But if natural gas is going to deliver on its promise, methane emissions due to

leaks, venting, and flaring need to be kept to a minimum."

"mass-for-mass, methane still has 28 to 34 times the greenhouse effect of carbon dioxide over 100 years."

<https://www.commondreams.org/news/2016/08/16/nasa-study-nails-fracking-source-massive-methane-hot-spot>

#### 14. Siding Springs

The dark sky park that has been declared and the observatory that depends on that are being sacrificed to this project. Gas flares will be going 24 hours a day so the night time will not be dark any more. Why does Santos' have a more privileged place than the world class Siding Spring Observatory? Why is Santos allowed to have its project and Siding Springs has to pay the price?

#### 15. Those who can't make submissions

Animals and plants have value. It might not be a dollar value but it's a real value nonetheless. Of course they can't enter the debate about the Narrabri Gas Project which will kill many of them. What was the point of the govt. spending \$40 million on the rewilding the Pilliga project if Santos is allowed to proceed?

<http://www.thecourier.net.au/news/world-first-for-pilliga/>

#### 16. Dishonest behaviour and sharp practice?

On the internet I saw this:

"Residents stuck living near the Chinchilla gas field have been posting for a week now ... "why has the gas flaring stopped?"

"Now we know ... the NSW Dept of Planning visited to view 'first hand' what the problems are. What an absolute scam by the CSG industry!"

NSW Government agencies visit Queensland gas fields

Date: 12.05.2017 Departmental Media Release

Is this true? Did you go for a first hand look and they turned off the flares so you'd get a better impression of their industry and operations?

If that did happen it speaks volumes and is pretty much the CSG industry themselves admitting that World's Best Practice might not pass muster with the NSW Dept. of Planning.

#### 17. My Recommendation

My Recommendation is that you refuse approval for the Narrabri Gas Project. It is wrong on so many levels. There is huge opposition to it and if approved there will be a backlash like the one in Lismore that frightened the govt. into buying back the licence there. I suggest the govt. buy back Santos' licence - like they did near Lismore - and that the whole area feeling the menace of Santos' current and future gas projects be liberated from that threat by the govt. guaranteeing that they will not now, or ever, allow CSG or fracking there.