

Mr Mike Young
Director of Resource Assessments
Department of Planning and Environment
320 Pitt St, Sydney NSW 2000
Via email: narrabrigas@planning.nsw.gov.au

19 May 2017

Dear Mr Young,

Re: Narrabri Gas Project – Environmental Impact Statement

Cotton Australia welcomes the opportunity to provide comment on the *Narrabri Gas Project – Environmental Impact Statement*.

Cotton Australia is the key representative body for Australia's cotton growing industry. The cotton industry is an integral part of the Australian economy, worth over \$1.3 billion in export earnings in the 2015–16 season, and employing on average 10,000 people. The industry's vision is: *Australian cotton, carefully grown, naturally world's best*.

Our members have diverse views on coal seam gas development. We have adopted a policy that is built on ensuring there are no negative impacts on land and water resources; that any decisions and approvals are made on best available scientific knowledge; and grower rights are respected during the land access negotiation process, with landholders receiving fair levels of compensation in recognition of the impacts of development.

Given this, we would ask that the NSW Government consider the following measures to ensure that decisions made regarding the Narrabri Gas Project are made on the basis of best available scientific modelling:

- Ensure that hard data feeding into groundwater modelling is made publicly available to allow for assessment of the information collected and collated by Santos. We are aware of local groups that would have appreciated the opportunity to commission independent assessments of the data. Not releasing this information with the EIS has limited the ability for this assessment and analysis to occur.
- The Santos EIS groundwater model is based on the assumption of simple layers, with no consideration of leaky wells or faulting. The parameters used in the model are largely guided by text book values, with very limited insights from pump tests. We would expect that pump tests would have been carried out to provide more accurate insights on groundwater connectivity and potential impacts associated with faulting.

- The starting water balance model used in the Santos EIS does not match the water balance modelling used to inform the Water Sharing Plans (WSP). Given licensing and water allocations occur across the zone according to the WSP, we would expect that water balance modelling would be aligned across the Narrabri Gas Project and WSP.
- Release geochemical measurements undertaken by Eco Logical Australia to allow for consideration of the data.

While Cotton Australia has a high level understanding of this proposed project, we urge the NSW Government to pay particular attention to the submission provided by Namoi Water. Namoi Water represents the interests of irrigation entitlement holders in the Namoi Valley, many of whom are cotton growers.

Should you have any questions regarding our submission please do not hesitate to contact me on 02 9669 5222 or FelicityM@cotton.org.au

Kind regards,



Felicity Muller
Policy Officer
Cotton Australia