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Department of Planning and Environment

Major Project Assessments

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To whom it may concern,

**SUBMISSION ON THE ECONOMIC, ENVIRONMENTAL AND SOCIAL IMPACTS OF THE NARRABRI GAS FIELD**

***Strategic economic importance of the Narrabri Gas Field (NGF) Chapter 3***

The strategic need for gas has been superseded by Australian gas companies over committing to foreign markets (where they receive the highest prices for CSG) which has resulted in increasing domestic prices so that CSG is now an unsustainable energy source. This situation is unlikely to change no matter how many gas fields are approved as the price of gas in NSW will always be determined by the highest bidding foreign purchaser. The only way to restore the NGF's strategic importance in the gas market for NSW is if Santos were required to reserve a substantial amount of the gas they propose to produce for NSW use.

**The NGF should not be approved because it will not result in an affordable source of energy for NSW. If it is approved then a condition of approval should require Santos to reserve a large percentage of gas for domestic use.**

***Groundwater and geology Chapter 11***

The EIS states that the NGF will have low impacts on every aspect of groundwater resources. However, the impacts are averaged over hundreds of years, which appear not to concern Santos. An impact of 0.5 draw down of the Namoi Alluvial and the Pilliga Sandstone aquifers (a major recharge point of the Great Artesian Basin) to fill the empty coal seam gas voids will have serious implications for future water use in this important food bowl. Likewise, the long term viability of ecosystem services provided by the Pilliga Scrub are jeopardised by this impact. The Pilliga Scrub is recognised as an important ecosystem service provider. It is the largest and most intact temperate eucalypt woodland in eastern Australia it is a unique ecological refuge in a heavily cleared agricultural area. As a matter of intergenerational equity an impact of half a metre drawdown could have severe consequences in an uncertain climatic future.

**The NGF should not be approved because of its long term impacts. If the NGF is approved it should be on the condition that Santos minimises long term impacts on surface aquifers undertakes rehabilitation so that long term drawdown doesn't occur at all or that the Shire of Narrabri is fully compensated for these future impacts on important water resources.**

***Average water use of 1.5GL per year***

The averaging of water use over the NGF's life expedient as 1.5GL use each year of the project ignores serious impacts in the second to fourth years as coal seams are initially depressurised. 1.5 GL per year is obviously not an accurate presentation of the NGF's actual water use for the project. Water licences issued to Santos entitle them to access much greater amounts of water from the Great Artesian Basin. This is of particular concern to irrigators who have sacrificed water and livelihoods since 2000 to protect their water resources into the future. The sudden availability of water for mining in an over allocated and stressed resource is derisive to irrigators who see themselves as custodians of the land. The CSG double standard is not lost on those producing food and fibre for NSW, particularly as the exploitation of coal seam gas in Narrabri will not be affordable to NSW citizens.

Large allocations to Santos on their water access licence can be sold and traded. Santos ought not to be allowed to trade this water for profit but it should be returned for the benefit of NSW citizens

**The NGF should not be approved for extensive use over the second to fourth years of the project's life without transparency about the actual amounts of water that will be drawn from the local water sources and allocated to Santos for the NGF. If the NGF is approved that approval should require a condition that the water allocated for the NGF cannot be sold on the water market.**

***Cumulative Impacts Chapter 29***

Unfortunately, the EIS completely disregards climate change impacts. The extraction of CSG has three tiers of impact on the climate with cumulative effects being counted where the gas is used. Irrigators cannot bypass responsibility for climate change impacts and are required to absorb past and future climate impacts regarding water use. These impacts have not been assessed to determine the liability left with the community by the NGF and its impact on current land uses now and into the future.

**The NGF should not be approved without an assessment of the climate change impacts of the project or if it is approved the approval should be should contain conditions to determine and mitigate these well recognised impacts.**

We appreciate your consideration of these issues.

Yours sincerely,

Kingfisher Law

