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

Date: 18th May 2017

Submission to the Narrabri Gas Project

Introduction

The Clarence Environment Centre (CEC) has maintained a shop-front in Grafton for over 27 years, and has a proud history of environmental advocacy. The conservation of Australia's natural environment, both terrestrial and marine, has always been a priority for our members, and we believe the maintenance of healthy ecosystems and biodiversity is of paramount importance. To that end we are making this submission to express major concerns with the above proposal.

The sheer enormity of the DA precludes any chance that a small organisation such as ours will have time or resources to read, much less analyse, the repetitive mass of mostly irrelevant material that Santos has placed on public exhibition.

As we see it, Santos plans to sacrifice our vital natural resources in the Pilligar forest to mine highly destructive coal seam gas, and in turn threaten the state's agriculture, precious water reserves, wildlife and the fabric of rural communities.

It appears that NSW, and indeed Australia stand to gain very little from this proposal, as most if not all gas produced will be exported, and tax will be minimised.

Unconventional gas mining negatives.

There are a large number of undisputed facts about the negative impacts of unconventional gas mining. Because it requires the process of hydraulic fracturing mining companies,

• cannot guarantee that groundwater will not become polluted,  
• cannot guarantee that aquifers will not be destroyed or diverted,  
• cannot guarantee that wells can be sealed to prevent methane leaks during or after use,  
• cannot guarantee that fugitive emissions will not create a fire hazard,  
• cannot guarantee that emissions will not have detrimental impacts on human health,  
• cannot guarantee that, in high rainfall areas, toxic 'produced' water will not escape into waterways,  
• cannot guarantee that toxic waste water will not leak into groundwater, and  
• cannot measure how much methane, a potent greenhouse gas is leaking directly through the ground into the atmosphere.  
• cannot permanently seal disused well heads, as cement casing predictably breaks down over time, allowing the methane to flow freely into the atmosphere for ever.
All the above effects have been recorded around the world wherever unconventional gas has been mined.

Also unconventional gas mining in the Pilligar forest:

- will have detrimental impacts on threatened species, and endangered ecological communities,
- will cause massive fragmentation of native bushland and wildlife habitat,
- will force unacceptable impacts on landowners and their neighbours through, noise, dust and odours, leading to social disruption, and physical and psychological health impacts.
- will create downward pressure on land prices, both in the short and long term,
- will disrupt and divide communities,
- will use high volumes of sometimes scarce water resources,
- will create unacceptable greenhouse gas emissions during the exploration, extraction, transportation and refining processes.
- will impact on roads and bridges,
- will, through increased traffic volumes, have negative road safety implications,
- will put significant pressure on public waste disposal facilities

Again, all of these negative impacts have been acknowledged in the EIS, and apparently deemed acceptable through some environmental offsetting, a process that always results in a net loss of biodiversity, and a highly exaggerated promise of employment and economic gain.

The proposed radical industrialisation of the rural landscape near Narrabri, transforming natural forest and productive farmland, into an 850 well gas field is unthinkable. From the receipt of 8000 objections already lodged opposing this gas-field, it is also clear that the proposal is unacceptable to local farmers, towns-people, traditional owners, conservationists and scientists.

Scientists have warned that this gas-field will de-water our natural environment by extracting over 35 billion litres of toxic salt-laden groundwater. It will generate almost 500,000 tonnes of salty brine laced with heavy metals and other toxins, with no disposal plans yet revealed.

There is even concern that light pollution from the giant gas flares may even force our globally recognised observatory at Siding Springs to close by ruining the dark skies it depends on.

Years ago, the founder of the "Lock the Gate" movement, Drew Hutton, emphasised the enormous threat that the communities around the country are facing, describing it as, “the greatest threat to rural Australia, and probably the most radical transformation of rural Australia since the pastoral expansion of the 19th century”.

Since then his prophesy has become reality with reports of polluted underground water, chronic sickness affecting children living in gas-fields, bores becoming flammable, and fugitive emissions seeping from underground, from supposedly sealed well-heads and from every joint in the system. Community opposition has continued to grow, as everyday Australians see and learn of the impacts that flow from unconventional gas mining, and the potentially devastating impacts of climate change, which is driven by the burning of fossil fuels.

In the bigger picture

The burning of coal seam gas contributes to global warming through greenhouse gas emissions. The International Energy Agency has identified as far back as 2012 that, by continuing business as usual, the world is currently on track for 6 degrees warming by 2100.

The Australian Government's Energy White Paper of that same year identified that coal and gas exports are set to rise for the foreseeable future. i.e. business as usual.
For the sake of future generations, the NSW Government must take the threat of global warming seriously, because not only are Australia's greenhouse gas emissions rising unchecked, but we are now one of the world's largest, if not the largest, exporter of greenhouse gas emissions through the unchecked sale of coal and gas overseas.

The burning of that coal and gas will lead to catastrophic levels of climate change yet, despite being made fully aware of the consequences, the Australian Federal and State Governments continue their reckless course regardless.

Therefore we urge the State Government to follow Victoria's lead, and refuse approval of the short term Narrabrai Gas project, and create long term sustainable solar power industry in that area to boost the local economy, and provide local jobs rather than supporting the fly-in – fly-out workforce that inevitably results from these mining ventures, and which bring little benefit to local businesses.

We thank the Minister for this opportunity to comment

Yours sincerely

John Edwards
Honorary Secretary
Clarence Environment Centre