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Robyn Walters (Secretary, North West Plains Sustainability Group)

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Please reject the Narrabri Gas Project

Attn: Executive Director, Resource Assessments

Department of Planning and Environment

GPO Box 39

Sydney NSW 2001

This is a submission to the Narrabri Gas Project EIS.

The North West Plains Sustainability Group (NWPSG) objects to this project and believes it should be rejected.

(NWPSG) objects to the Narrabri Gas Project on the grounds that this project risks:

- Contaminating a recharge area of the Great Artesian Basin (GAB)
- Lowering the water pressure in the Great Artesian Basin (GAB)
- Contaminating overland water flows that are part of the Murray Darling Basin (MDB)
- Contaminating fragile ephemeral wetlands.

Alternative energy sources are available eg solar that are renewable and do not pose the above listed risks.

The Precautionary Principle was applied when invoking the 2003 NSW Native Vegetation Act to mitigate any adverse unknown effects of vegetation clearing. Why isn't this same principle being applied to the Narrabri Gas Project and other gas projects to assist in protecting the integrity of GAB and MDB and its associated wetlands.

Background

Since 2005 NWPSG has supported landholders in the Walgett Shire (NW NSW) to take up sustainable farming practices and natural resource management and consequently facilitate resilient businesses and communities. NWPSG has 60 members who are involved in enterprises including extensive sheep and cattle grazing, broadacre dryland cropping and/or irrigated crops such as cotton.

Agriculture has been the predominant economic driver in this Shire since the early 1800s and in 2012 Walgett Shire was the third most productive Shire in NSW after Moree Plains and Griffith Shires.

Water

The supply of good quality, fresh water is fundamental and critical to operating any profitable farming business.

Sub artesian water supply

In the drought of the early 1900s local properties that were not located near rivers were abandoned due to the lack of a reliable water supply. It was not until Sub Artesian bores were sunk which accessed a reliable water source that these properties were resumed and became viable propositions. Since then sub-artesian water has been a significant driver of profitability and an important factor in preparing for drought.

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The GAB extends over 22% of the Australian continent where it is the only reliable groundwater or surface water source – especially important for the world's driest continent. It is unique in the world and a national icon similar to the Great Barrier Reef and Uluru. The Pilliga Sandstone, the location of the Narrabri Gas Project, is a recharge area for the GAB and its integrity is critical to ensure the GAB is fed with fresh, non-contaminated water.

A media release (12/5/17) from the Federal Minister of Agriculture states, "It's estimated that water from the Basin underpins at least \$12.8B in economic activity annually..." and "The Great Artesian Basin directly supports more than 180 000 people in more than 120 towns and 7600 businesses in regional and remote Australia...".

Approximately 20 years ago both landholders and government recognised the importance of minimising the wastage of this precious resource and invested in capping and piping bore schemes. This has resulted in a reduction in evaporation water loss of 95% and increases in bore pressures. To date government has invested \$115M and landholders have invested at least the equivalent amount in cash and time. This program is so successful that the Minister of Agriculture announced further funding of \$8M on 12/5/17.

The Narrabri Gas project risks these benefits. What will it cost if GAB is damaged? Can any damaged be repaired? Who will pay for repairing the damage?

Murray Darling Basin and associated ephemeral wetlands

The Walgett Shire adjoins Narrabri Shire and the proposed gas pipeline affects some ratepayers. The eastern part of the Shire is predominantly a floodplain for the Namoi, Barwon, Macquarie and Castlereagh Rivers and their tributaries. These rivers are part of the Murray Darling Basin. There are 200 listed, fragile ephemeral wetlands associated with these rivers. There is also a significant irrigated cotton industry associated with these rivers.

The pilot Narrabri Gas Project has produced concerning downstream water pollution. Especially worrying is the discharge of desalinated yet still contaminated waste water into the Bohena Creek, a tributary of the Namoi River. According to the EIS and Department of Planning & Environment, millions of litres of water that has been removed from the coal seam and processed via a Reverse Osmosis system, will be pumped directly into the creek. Whilst Reverse Osmosis is an effective purification process, it is not capable of removing ALL the various heavy metals and radioactive elements present in the coal seam water.

Monitoring of water quality will be conducted "in house" and down stream, rather than at point of injection, and whilst it can measure water quality against its specifically set contamination levels, it can do nothing if they are exceeded.

At peak production the Project will produce 115t of contaminated salt that, according to the EIS, is to be disposed of in landfill sites locally. This is 40,000t of salt a year, and all with the potential to be flushed into the Namoi river system in the occasion of a significant flood event.

The presence of either pollutants or salt in the Namoi River, in the quantity that the Project has the potential to produce, will not only affect local irrigators, but all townships and landholders reliant on the Namoi River for hundreds of kilometres downstream.

The Narrabri Gas project risks the Murray Darling Basin and associated wetlands. What will it cost if the Murray Darling Basin is damaged? Can any damaged be repaired? Who will pay for repairing the damage?

I urge the Government to reject this project and make the Great Artesian Basin recharge and Murray Darling Basin off-limits to gas mining.

Signed,

Robyn Walters

Secretary

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North West Plains Sustainability Group

Walgett

Yours sincerely,

Robyn Walters (Secretary, North West Plains Sustainability Group)

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