

For attention of Rob Sherry  
 NSW Planning Assessment Commission  
 GPO Box 3415 Sydney NSW 2001  
 Email: [pac@pac.nsw.gov.au](mailto:pac@pac.nsw.gov.au)

Wednesday, 11 June 2014

Dear Commissioners,

**PLANNING ASSESSMENT COMMISSION MEETING Thursday, 19 June 2014**  
**Bibbawindii Gas Exploration Pilot Expansion (SSD-5934) and**  
**Dewhurst Gas Exploration Pilot Expansion (SSD-6038),**  
**Narrabri Shire Council**

The Nature Conservation Council of NSW (NCC) is a non-profit, non-government organisation representing more than 120 community environment groups across NSW. We have long-standing experience in state environmental assessment and planning and wish to voice our concern about this proposed project.

We draw your attention to a serious error in the Planning Department's Assessment of the Dewhurst and Bibbawindii projects D298/14 and D297/14, comprising the next stage of the Santos Narrabri Gas Project. The error is carried through from in the Santos EIS for the projects. It completely invalidates the air pollution risk assessment of these projects.

The table below shows the air emissions reported by Santos for the Narrabri Gasfield Project to the National Pollutant Inventory for the period 2011/2012 and 2012-13 which includes significant quantities of toxic air contaminants not considered by the consultant advising Santos, RPS, in the air pollution risk assessment in Appendix 5 to the Santos EIS for the project.

The consultant has incorrectly assumed the well coal seam gas exit stream comprises solely of methane, which on combustion through flaring can produce contaminants of nitrous oxides etc. The consultant has NOT considered the company-reported air contaminants in the attached report downloaded from [NPI.gov.au](http://NPI.gov.au) for the Narrabri Gas Project. The consultant also did not take any samples from existing wells or flares to verify a 'clean' gas stream i.e. no baseline testing.

Substance	2011-12		2012-13
	Air (kg)	Total	Total (kg)
Carbon monoxide	37,393		12,993
Oxides of Nitrogen	163,508		2,473
Particulate Matter 10.0 um	612		240
Particulate Matter 2.5 um	612		240
Polycyclic aromatic hydrocarbons (B[a]P <sub>eq</sub> )	0.204		0.07
Sulfur dioxide	58		84
Total Volatile Organic Compounds	342,679		25,275

You will note that the company-reported data indicates, amongst other toxic air emissions, 343 tonnes of toxic non-methane Volatile Organic Compounds were produced (2011-12), and 25 tonnes in 2012-13.

This would imply that the claims made in the EIS that there are no significant air pollution risks are invalid, not being based on valid assumptions nor on actual data, publicly available.

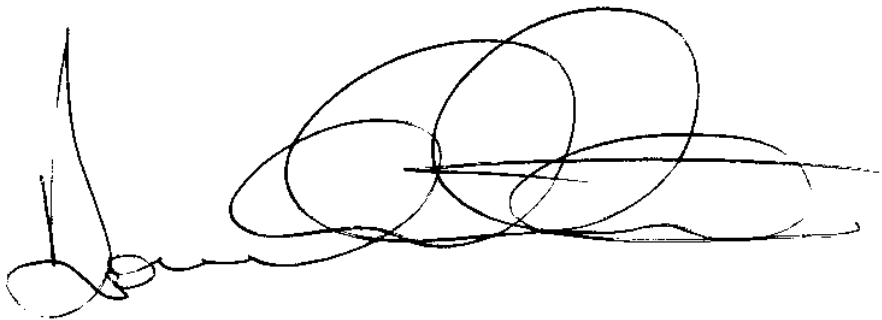
We recommend that the Department of Planning's Assessment should call for independent advice on this matter, and the subject EIS should be resubmitted, so that decisions are made on the basis of sufficient scientific basis for the conclusions to be drawn with respect to air pollution risks.

No well gas composition data has been included by Santos in the EIS, other than a claim that it is 96 % methane. Even if this was the case, 4% of other natural gas contaminants as listed below comprise a very large volume of toxic air pollution over the life of a set of wells. Flaring of this air pollution will cause additional toxic compounds.

Unfortunately, the EPA in NSW has set no guidelines at all for emissions of Volatile Organic Compounds, a serious problem if gasfields in NSW are to go ahead. The US EPA has established new oil and gas air pollution controls which will limit VOC emissions, requiring capture of these contaminants during well completion, and control over the lifetime of well and other production equipment.<sup>1</sup>

We content that this PAC should delay approval of this project until the EIS is resubmitted advice from Office of Coal Seam Gas and the NSW EPA can be supplied on this matter of inadequate consideration of the risks of non-methane air pollution.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Donald O White', with a large, stylized flourish extending to the right.

Prof Donald O White  
Chair NCC

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<sup>1</sup>See <http://www.epa.gov/airquality/oilandgas/index.html>

- a new source performance standard for VOCs; a new source performance standard for sulfur dioxide; an air toxics standard for oil and natural gas production; and an air toxics standard for natural gas transmission and storage.